

TSD File Inventory Index

Date: April 3, 2001
Initial: CM/Kennedy

Facility Name: <u>Savoy Hosiery, Inc. (the Federal Site)</u>			
Facility Identification Number: <u>OHD 093 289 700</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	Y	.1 Correspondence	Y
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	Y
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	X
.4 Financial Insurance (Sudden, Non Sudden)	Y	.1 Land Disposal Restriction Notifications	Y
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports <u>D.1.4</u>	X
.2 Closure/Post Closure Plans, Certificates, etc	Y	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring	Y	.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

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.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual field generated data.

**A.2 Part A/
Interim Status**

FACILITY NAME

SALCAP ABRASIVES INC

EPA ID NUMBER

OHD093289700

FACILITY OPERATOR

SALCAP ABRASIVES INC

FACILITY OWNER

SALCAP ABRASIVES INC

FACILITY LOCATION

18123 ARMOUR ST NE
ALLIANCE

OH 44601

PROCESS CODE -----	DESIGN CAPACITY -----	UNIT OF MEASURE -----
S01	5500.00000	G

*****KEY*****

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE	* UNIT OF MEASURE	CODE

STORAGE:			* GALLONS	G
			* LITERS	L
CONTAINER	S01	G OR L	* CUBIC YARDS	Y
TANK	S02	G OR L	* CUBIC METERS	C
WASTE PILE	S03	Y OR C	* GALLONS PER DAY	U
SURFACE IMPOUNDMENT	S04	G OR L	* LITERS PER DAY	V
DISPOSAL:			* TONS PER HOUR	D
			* METRIC TONS\HOUR	W
INJECTION WELL	D79	G, L, U, OR V	* GALLONS\HOUR	E
LANDFILL	D80	A OR F	* LITERS\HOUR	H
LAND APPLICATION	D81	B OR Q	* ACRE-FEET	A
OCEAN DISPOSAL	D82	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	* ACRES	B
TREATMENT:			* HECTARES	Q
			* POUNDS\HOUR	J
TANK	T01	U OR V	* KILOGRAMS\HOUR	R
SURFACE IMPOUNDMENT	T02	U OR V	* TONS PER DAY	N
INCINERATOR	T03	D, W, E, OR H	* METRIC TONS\DAY	S
OTHER	T04	J, R, N, S, U, V	*	



TOLL FREE: 800-8 SANCAP
IN OHIO: 216-821-3510
TWX: 910-9970713

SANCAP Abrasives Inc.
16123 Armour Street, N.E.
P.O. Box 2300
Alliance, Ohio 44601

N/A

February 19, 1986

OHIO 093 289 700

RECEIVED

FEB 24 1986

SWD CID
U.S. EPA, REGION V

United States Environmental Protection Agency
Region 5
230 S. Dearborn St.
Chicago, Ill. 60604

ATTN: 5HS-JCK-13

Gentlemen:

In regards to the enclosed, it should be noted that SANCAP Abrasives Inc. is not a permit applicant or a permit holder for hazardous waste under RCRA. We reference your correspondence of March 22, 1983 of which we have included a copy.

If you have any further questions concerning this matter please feel free to contact me at 216-821-3510. Thank you.

Sincerely,

Roger W. Riffle
R & D Chemist

RWR/jc
Enc.

cc: Mr. Jim Huff
Huff & Huff Inc.
LaGrange, Ill. 60525



ENVIRONMENTAL PROTECTION AGENCY

REGION V

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

RUDI GOLDI

MAR 25 1983

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

MAR 22 1983

Mr. R. Goeldi, Vice President
Sancap Abrasives Incorporated
16123 Armour Street N.E.
Alliance, Ohio 44601

RE: Withdrawal of Part A
(Storage fewer than 90 Days)
FACILITY NAME: Sancap Abrasives Incorporated
USEPA ID NO.: OHD 093 289 700

Dear Mr. Goeldi:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and Your letter of June 25, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility has accumulated wastes generated on site for fewer than 90 days in containers or tanks since November 19, 1980, in accordance with 40 CFR Part 262.34. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time.

Please be advised that you must ensure that your waste is handled in accordance with 40 CFR Part 262.34 (enclosed), and applicable State and local requirements.

Please contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Withdrawal of Part A (Storage fewer than 90 Days)," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: R. J. Kron, Plant Manager
D. J. Bolle, President
OEPA

SANCAP

ABRASIVES INC.

*Copy to SIO
copy to notify (Gus)
orig to PA (Becky)*

RECEIVED

JUN 28 1982
WASTE MANAGEMENT BRANCH
EPA REGION V

June 25, 1982

Ms. Kathy Homer
State Implementation Officer
Hazardous Waste Management Branch
U.S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, Illinois 60604

RE: Interim Permit Application Withdrawal Request
EPA I.D. No. OHDO93289700 *g BDP*

Dear Ms. Homer:

SANCAP Abrasives, Inc. hereby requests that our application to operate a storage facility for hazardous waste under interim status be withdrawn.

At the time of our original application, we were not certain that we could move our wastes every ninety days. Based on our experience to date, we now feel confident that we can have our wastes removed within the ninety days required of generators only.

We would appreciate some acknowledgement when this request has been acted upon.

Very truly yours,

R. Goeldi

R. Goeldi
Vice President

RG:se

cc: Thomas E. Crepeau
Permits & Manifest Records Section
Division of Hazardous Materials Management
Ohio EPA
361 E. Broad Street
Columbus, Ohio 43216

*Does this facility
need a closure plan?*

*K. Homer
6/28/82*

*Yes
DH
9/23*

RECEIVED
6-30-82



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAY 27 1982

Ronald J. Kron, Plant Manager
Sancap Abrasives Incorporated
16123 Armour Street, N.E.
Alliance, Ohio 44601

RE: Interim Status Acknowledgement USEPA ID No. OHD 093 289 700
FACILITY NAME: SANCAP ABRASIVES INC

Dear Mr. Kron:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Karl J. Klepitsch, Jr.", is written over the typed name.

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: D. J. Bolle, President

Handwritten note: R-3/25/82

FORM 1	EPA	ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px; font-family: monospace; font-size: 1.2em;">040093289700</div>
III. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		<div style="border: 1px solid black; padding: 10px; min-height: 150px;"> PLEASE PLACE LABEL IN THIS SPACE </div>	

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)			X
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	SANCAP Abrasives Inc
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IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	Kron Ronald J Plt Mgr	216	821 3510

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX			
3	16123 Armour St NE		
B. CITY OR TOWN		C. STATE	D. ZIP CODE
4	Alliance	Oh	44601

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER					
5	16123 Armour ST NE				
B. COUNTY NAME					
Stark					
C. CITY OR TOWN			D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6	Alliance	Oh	44601		

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7	3	2	9	1	(specify)					7					(specify)				
15	16	17	18	19						15	16	17	18	19					
C. THIRD										D. FOURTH									
7					(specify)					7					(specify)				
15	16	17	18	19						15	16	17	18	19					

VIII. OPERATOR INFORMATION

A. NAME																									B. Is the name listed in Item VIII-A also the owner?									
8	S	A	N	C	A	P	A	b	r	a	s	i	v	e	s	I	n	c									<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 66							
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																				D. PHONE (area code & no.)														
F = FEDERAL S = STATE P = PRIVATE										M = PUBLIC (other than federal or state) O = OTHER (specify)										P (specify)					2 16 8 2 1 3 5 1 0 15 16 17 18 19 20 21 22 23 24 25									
E. STREET OR P.O. BOX																																		
1 6 1 2 3 A r m o u r S t N E																																		
F. CITY OR TOWN																				G. STATE					H. ZIP CODE					IX. INDIAN LAND				
B A l l i a n c e																				Oh					4 4 6 0 1					Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 52				
15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40																				41 42 43 44 45 46 47 48 49 50 51 52														

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)															NPPES Permit Application filed 3/17/78 for cooling water discharge														
9 N															9 P																													
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)																													
9 U															9															(specify)														
C. RCRA (Hazardous Wastes)															E. OTHER (specify)																													
9 R															9															(specify)														

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturer of Coated Abrasives and Coated Products.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)															B. SIGNATURE															C. DATE SIGNED														
D. J. Bolle President																														11/18/80														

COMMENTS FOR OFFICIAL USE ONLY

C																													
15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40																													

FORM 3 RCRA	EPA	ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	PERMIT NUMBER OH0093289700	T/A/C 1
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FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	
<div><div>33</div><div>24</div><div>23</div></div>		

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)		2. NEW FACILITY (Complete item below.)	
<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)		<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)	
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)		FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN	
<div><div>71</div><div>70</div><div>69</div></div>	<div><div>71</div><div>70</div><div>69</div></div>	<div><div>71</div><div>70</div><div>69</div></div>	<div><div>71</div><div>70</div><div>69</div></div>

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

T/A/C 1														
DUP														
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15														
B. PROCESS DESIGN CAPACITY														
FOR OFFICIAL USE ONLY														
1. AMOUNT (specify)														
2. UNIT OF MEASURE (enter code)														
X-1 S 0 2 600 G														
X-2 T 0 3 20 E														
1 S 0 1 5500 G														
3														
4														

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. **PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA ID NUMBER (enter form number 71)										FOR OFFICIAL USE ONLY									
W 0400 93289700										W DUP									
DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
	23	24	25	26			27	28	29	30	31	32	33	34					
1	F	0	0	5	10,000	P	S	0	1										
2	D	0	0	1	1,000	P	S	0	1										
3	U	0	0	2	0	P	S	0	1				Potential Spill						
4	U	1	5	9	0	P	S	0	1				" "						
5	U	2	2	0	0	P	S	0	1				" "						
6	U	1	1	2	0	P	S	0	1				" "						
7	U	1	2	5	0	P	S	0	1				" "						
8	U	1	5	4	0	P	S	0	1				" "						
9	U	2	3	8	0	P	S	0	1				" "						
10																			
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24																			
25																			
26																			

IV. DESCRIPTION OF HAZARDOUS WASTE, (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

NO. (enter from page 1)									
F 0HD 093289700									
T/A C 6									

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
4	0	5	6	0	4	5	0	8	1	0	5	0	3	0					
65	66	67	68	69	70	71	72	73	74	75	76	77	78	79					

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)									
E										55 56 57 58 59 60 61 62 63 64									
3. STREET OR P.O. BOX										4. CITY OR TOWN									
F										G									
5. ST.										6. ZIP CODE									
15 16 17 18 19 20 21 22 23 24										40 41 42 43 44 45 46 47 48 49									


IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

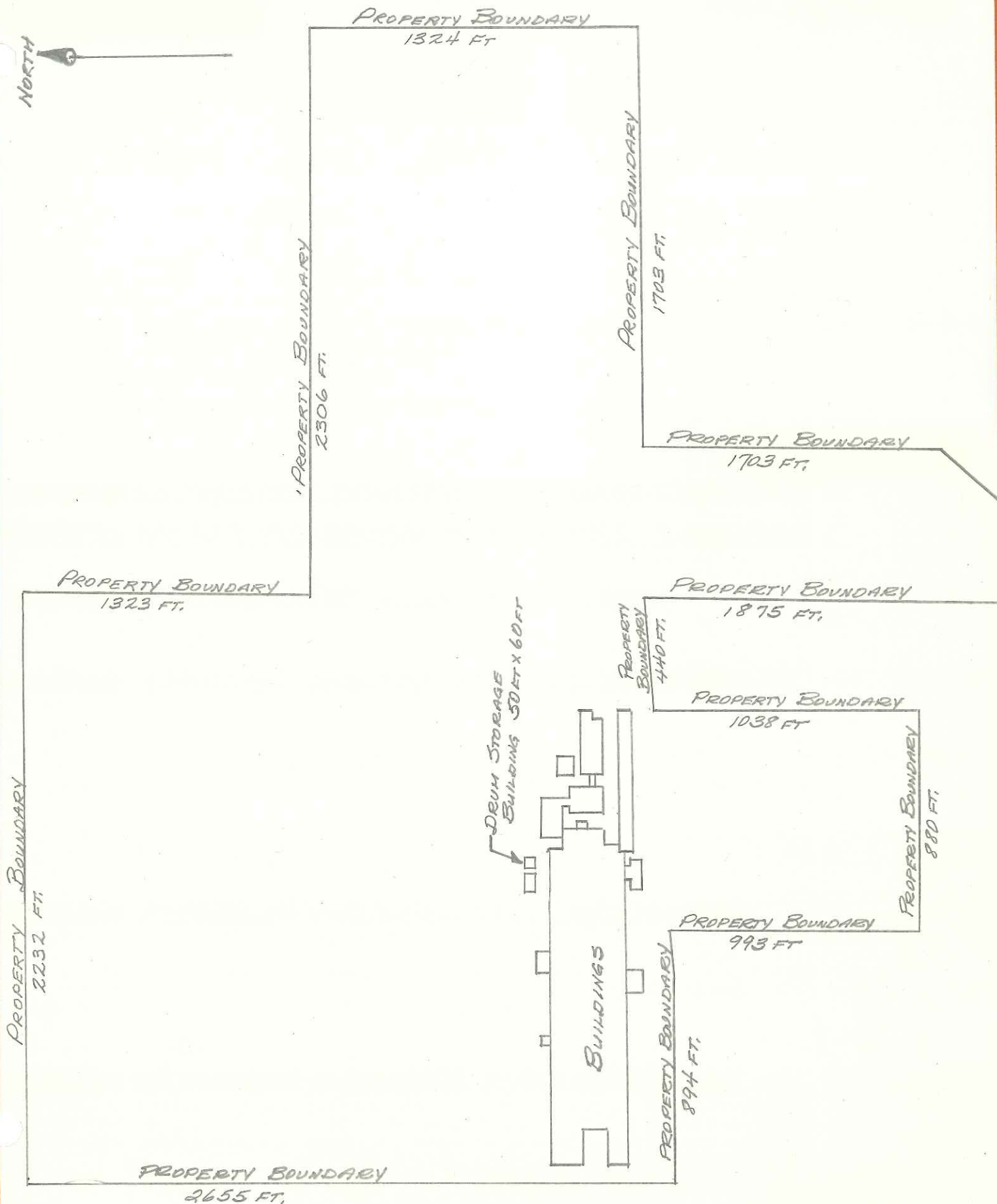
A. NAME (print or type) D. J. Bolle President	B. SIGNATURE 	C. DATE SIGNED 11/15/80
---	---	----------------------------

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type) D. J. Bolle President	B. SIGNATURE 	C. DATE SIGNED 11/15/80
---	---	----------------------------

V. FACILITY DRAWING (see page 4)

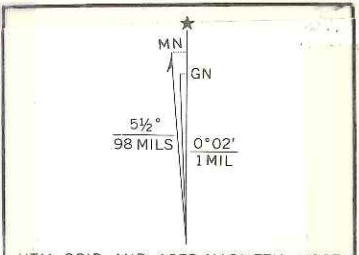


SCALE: 1 INCH = 500 FT.



SANCAP ABRASIVES INC.

HWM



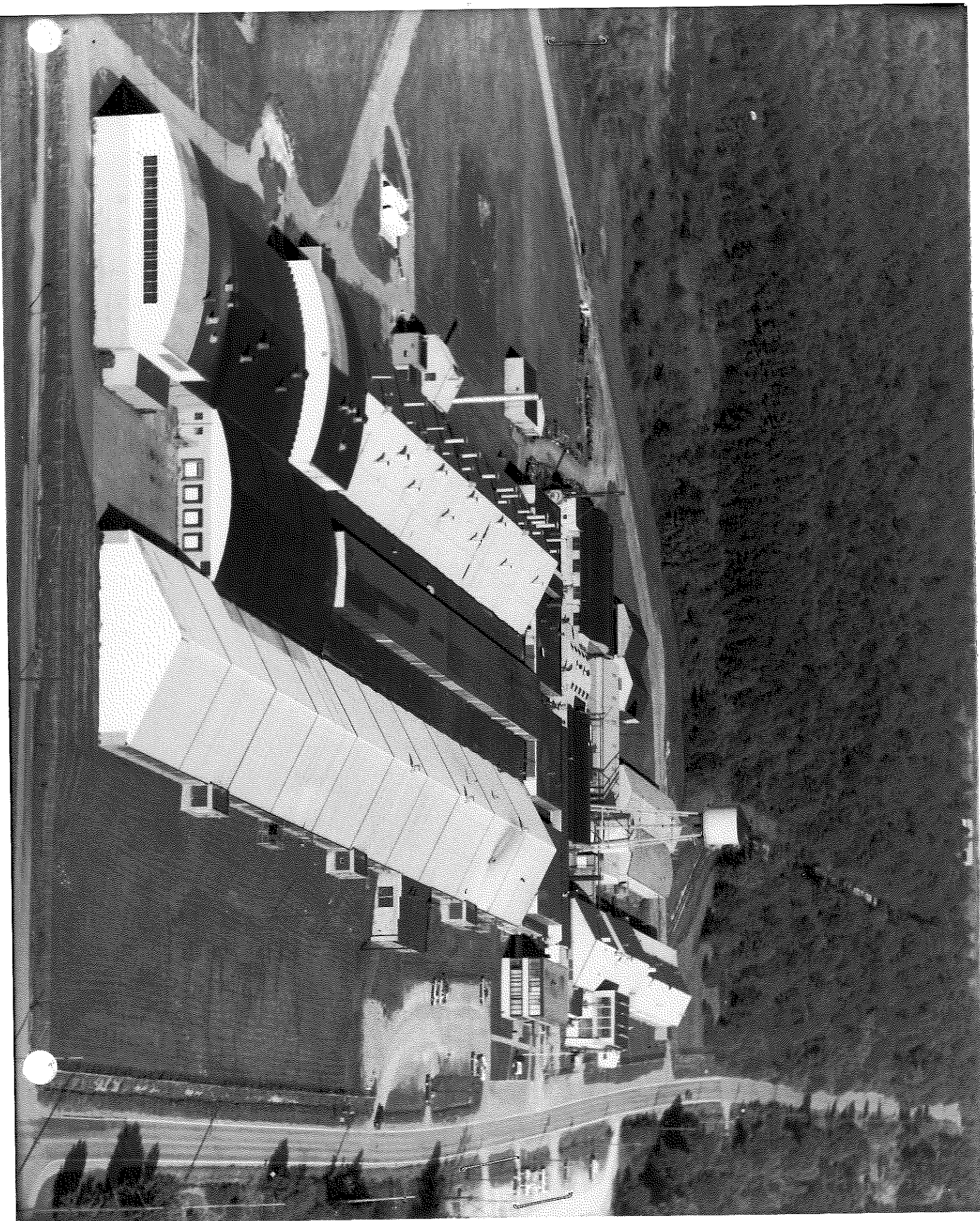
UTM GRID AND 1978 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

USGS MAP-
ALLIANCE, OHIO

LOCATION MAP
SANCAP ABRASIVES
ALLIANCE, OHIO

SCALE 1:24 000







RECEIVED
SEP 05 1997

Ground Water Monitoring Report
Former Wastewater Treatment Lagoon Site
Sancap Abrasives

DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA
1.0 INTRODUCTION

In May 1992, Sancap Abrasives received an Ohio Environmental Protection Agency (Ohio EPA) "Permit to Install" as approval to proceed with closure activities at the company's wastewater treatment lagoon site in Alliance, Ohio. Included in the permit are requirements for monitoring the site's four ground water monitoring wells semi-annually over a three-year period. According to the permit, monitoring is to be conducted in June and December for the parameters specified in the permit.

This ground water monitoring report prepared by Rust Environment & Infrastructure (Rust) describes sampling and analysis procedures and findings for the second 1995 semi-annual monitoring event which was conducted on December 5, 1995. This is the sixth ground water monitoring event conducted since closure of the lagoons in June, 1993. Site and regional geologic and hydrogeologic conditions have been described in the previously submitted Site Evaluation Report for Wastewater Treatment Lagoons Site (by Lancy Environmental Services dated March 1989). Therefore, a detailed description of these conditions will not be repeated in this report.

TABLE 3
RANGE IN CONCENTRATION (MG/L)
DOWNGRAIDENT WELLS (MW-2, 3, 4)
NOVEMBER 1988 THROUGH DECEMBER 1995 EVENTS

Parameter	11/21/88	6/02/93	12/03/93	6/01/94	12/02/94	6/06/95	12/05/95
pH (S.U.)	6.5-8.6	6.8-12	6.7-7.1	6.8-7.2	6.5-6.8	6.5-7.2	6.7-7.0
Spec. Conduc- tance (umhos)	>1990	530-3390	2300-2890	2200-2770	1440-3400	3360-4440	2370-2990
Total Dissolved Solids	3000-4500	1800-4600	3800-4300	3500-4800	3300-5100	3700-5100	3380-5160
Oil and Grease	<2.0	<2.0-4.9	<2.0	<2	<2	<2.0-4.0	<1
Phenols	<0.002-0.017	0.010-0.018	<0.005-0.01	0.01-0.011	<0.005- 0.015	<0.005-0.015	<0.005
Sulfate	2300-3100	810-3100	2300-3100	2400-3200	2200-3200	2400-3200	2470-3340
Total Organic Carbon	13-17	3-4	4-5	<1-3	2-3	1.3-1.9	1.6-1.9
Total Organic Halides	<0.01-0.03	<0.01-0.01	<0.01-0.01	<0.01- 0.04	<0.01	0.04-0.05	0.036-0.042
Arsenic	<0.002	<0.01-0.022	<0.01-0.01	<0.01	<0.01	<0.01-0.006	<0.005
Barium	0.04-0.08	<0.2	<0.2	<0.2	<0.2	<0.2	<0.01-0.01
Cadmium	<0.004	<0.005	<0.005	<0.005	<0.005	0.005-0.006	<0.01
Chromium	<0.006-0.007	<0.01-0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Lead	<0.1-0.1	<0.003	<0.003	<0.003- 0.008	<0.003- 0.003	<0.003	<0.1
Manganese	<0.001-2.6	<0.01-2.69	0.64-3.0	0.48-2.3	0.14-2.5	0.58-2.5	0.54-2.3
Mercury	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002- 0.0003
Nitrogen Nitrate	NA	0.02-0.05	0.06-0.12	0.03-0.07	0.02-0.08	0.04-0.25	0.02-0.05
Selenium	0.015-0.05	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Thallium	<0.3-43	<1	<1	<1	<0.01	<0.01	<0.1
Zinc	<0.05	<0.02	<0.02-0.06	<0.02-2.8	0.02-0.38	<0.02-0.05	0.01-0.12
Acetone (µg/L)	110	<10-36	<10	<10	<10	<10	<10

NA = Not Analyzed

SANCAP ABRASIVES, INC. (OHD 093 289 700)

The Sancap Abrasives, Inc. (Sancap Abrasives), facility is located in Alliance, Ohio. The 280-acre facility was built prior to 1948 and used by Turner Aircraft (Turner) to manufacture light observation aircraft. Ownership of the facility changed many times between 1948 and 1979. In 1979, Sancap purchased the facility. Sancap was regulated from November 1980 to June 1982 as a hazardous waste storage facility. Currently, three businesses occupy the Sancap facility: Sancap Abrasives; Sancap Liner, Inc. (Sancap Liner); and Quality Repair and Maintenance (QRM). Sancap Abrasives manufactures sandpaper and other coated abrasives. Sancap Liner produces bottle cap liners and other coated products. QRM maintains the equipment at Sancap Abrasives and Sancap Liner. Sancap Abrasives generates and manages methylene chloride (F002), methylene chloride still bottoms (F002), nonhazardous wastewater, abrasive and liner trim, used oil, and hardened resin. Currently, the facility is regulated as a small-quantity generator. Nine SWMUs were identified at the facility during a VSI including a number of settling lagoons.

A possible release was scored for the groundwater route. Monitoring wells have not indicated any contamination. Containment was scored as "poor" because of four unlined lagoons that have been contaminated with barium. Groundwater is used for drinking water. The nearest downgradient well is within 500 feet of the facility.

No observed release was scored for the surface water route. The facility has an NPDES permit, but no violations of the permit have been documented. Containment was scored as only "good" because the barium-contaminated lagoons are bermed, but no diking or diversion structure is in place to prevent surface water runoff. The nearest surface water body, the Mahoning River, is located within 1 mile of the facility. The Mahoning River is used for recreational purposes.

No observed, unpermitted, ongoing release was scored for the air route. The facility has air permits, but no violations of the permits have been documented. Containment was scored as "poor" because an uncovered box containing methylene chloride is located outdoors. Residential areas are located within 1/4 mile of the facility. Sensitive environments are located 1/2 to 1 mile from the facility.

The on-site soils score was based on documented barium contamination in lagoon sediments that have poor containment. The facility was classified as having "limited access" because a partially open fence is the facility's only means of security.

SANCAP ABRASIVES, INC. (OHD 093 289 700)

(Continued)

Reference:

PRC, 1992. Draft PA/VSI Report for the Sancap Abrasives Facility in Alliance, Ohio, December 21.

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

SANCAP ABRASIVES, INC.

EPA SITE NUMBER: OHD 093289700

ALLIANCE, OH

SCORED BY: AL STONG

OF PRC EMI

ON 02/26/93

GROUNDWATER SCORE : 95.56

SURFACE WATER SCORE: 20.57

AIR ROUTE SCORE : 13.70

ONSITE SCORE : 6.86

MIGRATION SCORE : 49.47

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? P

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : 50

NET PRECIPITATION (IN.) : 10

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: BARIUM

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 9500
DRUMS : 0

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.4

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N
IS THERE A PERMITTED OUTFALL? Y
HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER
24-HOUR RAINFALL: 2.5
DISTANCE TO SURFACE WATER (MILES): 0.50
PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: BARIUM

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 9500
DRUMS : 0

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION
DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.7
DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.7

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Y

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: METHYLENE CHLORIDE

TOXICITY/PERSISTENCE VALUE: 2

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS:	40
DRUMS :	0

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.7

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: LIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: BARIUM

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.20

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

SANCAP ABRASIVES**FAX COVER SHEET**

18123 Armour St NE
Alliance, OH 44801
USA
phone: 1-330-821-3510
fax: 1-330-821-3516

SEND TO	
Company name	From Cheryl
EPA	Date 5-2-02
Attention TOM MANNING	Phone number 330-821-3510
Fax number 312-353-4788	

Urgent Review Confidential

Total pages, including cover:

3

COMMENTS

Attached is a copy of the letter
from the Ohio EPA.

If you need anything else, please
call

Thanks
Cheryl

PS Also attached is a letter sent to
Ohio Dept of Natural Resources
regarding the decommissioning

OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

AUG 26 1999

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

August 24, 1999

RE: Sancap Abrasives

Mr. Dale Skoff
Earth Tech
103 Bradford Road
Suite 300
Wexford PA 15090

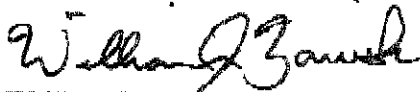
Dear Mr. Skoff:

The June 17, 1999 request to decommission four monitoring wells at the Sancap Abrasives Alliance facility has been reviewed by this office.

Please consider this letter as acceptance of your proposed decommissioning plan. Within thirty days following completion of all work please submit the well sealing report to this office.

Should you have further questions please feel free to call me at 330/963-1134.

Sincerely,



William J. Zawiski
Environmental Scientist
Division of Surface Water

103 Bradford Road, Suite 300, Westford, Pennsylvania 15090

October 22, 1999

Ohio Department of Natural Resources
Division of Water
1939 Fountain Square Drive
Columbus, Ohio 43224-9971

RE: Water Well Sealing Reports
Sancap Abrasives, Inc., Alliance, Ohio

Dear Sir/ Madam:

Enclosed please find Ohio EPA Water Well Sealing Reports associated with the decommissioning of four groundwater monitoring wells at the Sancap Abrasives, Inc. site located in Alliance, Ohio. The wells were installed in 1988 as part of a site evaluation pursuant to closure of wastewater treatment lagoons located on the property. Following completion of the monitoring period required by the Ohio EPA Permit To Install, a request was made to the Ohio EPA Northeast District Office to decommission the wells according to Ohio EPA requirements. On August 24, 1999, Ohio EPA Division of Surface Water approved the request to decommission the monitoring wells.

Telephone

724.934.1666

The attached forms document the decommissioning of the wells which was conducted on September 23 and 24, 1999 according to the procedures outlined in "Chapter 9 Monitoring Well And Borehole Abandonment" of the "Ohio EPA Technical Guidance Manual for Hydrogeologic Investigations and Groundwater Monitoring" (dated 1995). The following summarizes the field activities, which were supported by an auger drill rig:

Facsimile

724.934.1690

- The protective casing and concrete pads were removed.
- PVC riser was pulled at all locations followed by over-drilling to remove remaining well construction materials to the total depth of the well.
- Boreholes were sealed with installation of cement/bentonite grout slurry placed by tremie pipe from the bottom of the borehole to the ground surface.

Please feel free to contact me at (724)934-2610 with any questions regarding the well decommissioning.

Very truly yours,
Earth Tech, Inc.



Dale E. Skoff, CPG, CHMM
Senior Project Manager

Cc: Bill Zawiski - Ohio EPA, Division of Surface Water
Don Monnot - Sancap Abrasives, Inc.

L:\WORK\37558\PROJ

E A R T H



T E C H

A EARTH INTERNATIONAL LTD. COMPANY



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW

FEB 8 1983

Mr. R. Goeldi
Vice President
SANCAP Abrasives, Incorporated
16123 Armour Street
Alliance, Ohio 44601

Re: OHD 093-289-700
SANCAP Abrasives, Inc.
Alliance, Ohio

Dear Mr. Goeldi:

Thank you for forwarding the certifications to finalize the closure of your drum storage site. Closure was accomplished by the removal of drummed hazardous waste and the decontamination of the area. This completion does not relieve you of requirements under State law.

Since this closure is now complete, we consider this facility closed; and it will no longer be listed in our data base. Your status will be that of generator only.

Please contact Mrs. Elizabeth Utley of my staff, at (312) 886-6162, if you have any further questions.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

cc: Tom Carlisle, w/plan

bcc: Tom Golz
Liz Utley

FEB 8 1983

5HW

Mr. R. Goeldi
Vice President
SANCAP Abrasives, Incorporated
16123 Armour Street
Alliance, Ohio 44601

Re: OHD 093-289-700
SANCAP Abrasives, Inc.
Alliance, Ohio

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Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Tom Carlisle, w/plan

bcc: Tom Golz
Part A File

5HW:Liz Utley:pg:1-27-93

INITIALS	DATE	TYPIST	AUTHOR
pp	1-27-83	GAH	1-31-83

CHIEF	CHIEF	DIRECTOR
DJB 2/2/83	WMB 2/3/83	AHMD 2/7/83

DMR-383
O.R. 2/4/83
KJK
2/4/83
2/7

January 20, 1983

Ms. Elizabeth Utley
Hazardous Waste Management
U. S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, Illinois 60604

Ms. Utley:

Having inspected the plant facility and the Closure
Plan of SANCAP Abrasives Inc. I certify that the
proper procedures have been executed for closing
the hazardous waste storage facility.

Signed: 

D. F. Monnot, P. E.
(Registered Professional
Engineer E-021443)
3160 Ridgehill
Alliance, Ohio 44601

RECEIVED
JAN 27 1993
**WASTE MANAGEMENT
BRANCH**

SANCAP

ABRASIVES INC.

October 11, 1982

Mr. David Homer
Hazardous Waste Management Branch
U. S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, Illinois 60604

Dear Mr. Homer:

Enclosed is a copy of SANCAP Abrasives, Inc.,
Closure Plan as requested.

Very truly yours,



R. J. Kron
Plant Manager

RJK/cw

Enc.



CLOSURE PLAN

SANCAP ABRASIVES, INC.
16123 ARMOUR STREET, N.E.
ALLIANCE, OH 44601
216/821-3510

EPA I.D. NUMBER:

OHD-00037191

040093289700

RECEIVED
OCT 1 1981
WASTE
IN
PA
GTSO

Prepared:

April 1, 1981

By:

James E. Huff, P.E.

I. FACILITY DESCRIPTION

A. General Information

Sancap Abrasives operates one hazardous waste storage facility, located in building 24. This facility is permitted to store up to a maximum of 100 drums, or 5,500 gallons of hazardous waste.

There are no other hazardous waste treatment, storage, or disposal facilities at this site.

Sancap generates approximately 10,000 pounds per year of spent solvents classified as hazardous waste number F005. Included in this classification are the following spent solvents: methanol, toluene, and methyl ethyl ketone. In addition, Sancap generates approximately 1,000 pounds per year of ignitable wastes (D001), including isopropyl alcohol, cellosolve solvent, cellosolve acetate, and several other small quantity solvents. In addition, spills of the following chemicals are drummed and placed in the drum storage area:

<u>EPA Hazardous Waste No.</u>	<u>Substance</u>
U002	Acetone
U159	Methyl ethyl ketone
U220	Toluene
U112	Ethyl acetate
U125	Furfural
U154	Methanol
U238	Urethane

The historical spill frequency of these substances has been less than once per year. All of the above hazardous wastes are liquid, and the vast majority (greater than 99%) are solvents which can be reclaimed. Combustion temperatures of these wastes are very close to the published values for the pure compounds. The specific gravities are slightly greater than the published values because of the contamination in the spent solvents.

B. Maximum Inventory

The maximum amount of inventory ever on-site is equal to the permitted drum storage area of 100 drums, or 5,500 gallons.

C. Inventory of Auxiliary Equipment

The drums are stored in a building with a concrete floor. No auxiliary equipment is utilized in the storage of the hazardous waste.

D. Schedule of Final Closure

1. Final date waste accepted for storage: June 1, 2030.
2. Dates for completion of inventory disposal.

All waste will be hauled off-site by August 15, 2030. The solvents will be sent to a solvent reclaimer. Any other hazardous waste will be landfilled, although little or no non-solvent hazardous waste is anticipated.

3. Final date facility decontaminated: August 30, 2030.
4. Final date closure completed: September 30, 2030.
5. Total time required to close facility: 120 days.

II. REMOVING ALL INVENTORY

- A. As stated previously, the maximum number of drums of hazardous waste on-site at any one time is 100 drums, or 5,500 gallons. Historically, this waste material has been 100% spent solvents which can be reclaimed. Other hazardous waste would include spills from other chemicals handled, as identified in Part IA.
- B. Pretreatment Requirements: No pretreatment is necessary prior to shipping to a reclaimer.

C. Procedure for Removing Inventory

At the time of preparing this closure plan, Frontier Chemical Waste Process, Inc. is handling the hazardous wastes. Frontier pumps the wastes out of the 55 gallon drums into its tank truck. For 100 drums maximum inventory, Frontier would require two truck loads.

Frontier reclaims the solvents; they are located in Niagara Falls, New York, approximately 200 miles away.

III. DECONTAMINATING THE FACILITY

A. Potential Soil Contamination: None. All drums are stored in a building with a concrete floor.

B. Equipment and Facilities Requiring Cleaning

As Frontier leaves the empty drums behind, these drums must be thoroughly drained of waste material. This draining should be performed during the period when Frontier is emptying the drums into the tank truck. Any additional material that drains from the drums should be collected and also pumped into the tank truck.

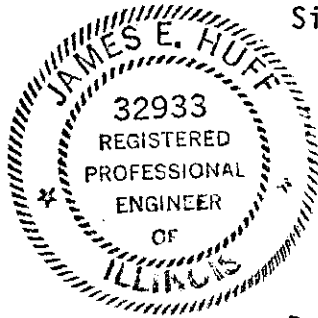
A detergent should be added to each empty drum and the drums triple rinsed, with the wash water sewered to the local POTW. The estimated volume of wastewater generated is 30 gallons per drum, or 3,000 gallons, plus 100 gallons for cleaning the drum storage areas.

IV. CLOSURE CERTIFICATION

During the closure program, it is estimated that three inspections by a registered professional engineer will be required to certify that the Closure Plan was properly followed---one inspection after the hazardous wastes have been hauled off, one after the drums and concrete pad have been cleaned, and one when the closure plan is completed.

V. CERTIFICATION

Having examined the plant facility of Sancap Abrasives, Inc. and being familiar with Provisions of Federal Regulations 40CFR264.110 through .115 (interim final) and 40CFR265.110 through .115 (interim final) and the Draft Report entitled "Draft Guidance for Subpart G of the Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities," dated October 6, 1980, I certify that this closure plan has been prepared in accordance with the regulations and good engineering practices.



Signed: _____

James E. Huff, P.E.

Huff & Huff, Inc.

1030 S. LaGrange Road

LaGrange, IL 60525

(Registered Professional Engineer
IL 32933)

Dated: _____

April 24, 1981

Approved: _____

D. J. Bolle

President

Sancap Abrasives, Inc.

Dated: _____

4/29/81

SANCAP

ABRASIVES INC.

OHDO93289700
Notif. P.A. DH.

*510P
for
less
than
90
g.s.
out to
tech
staff*

replied

July 1, 1982

Regional Administration
U.S. Environmental Protection Agency
RCRA Financial Requirements
Box A3587
Chicago, Illinois 60690-3587

Re: Financial Requirements EPA I.D.No. OHDO93289700

Dear Sir:

SANCAP Abrasives, Inc. has submitted a withdrawal request for our application to operate a storage facility for hazardous waste. (Copy of letter attached.)

Therefore, we will not be providing the evidence of financial responsibility.

Very truly yours,



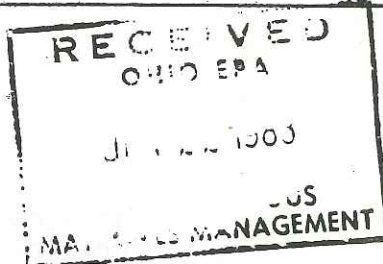
R. J. Kron
Plant Manager

RJK:se
Attached: (1)

**C.2 Compliance/
Enforcement**

Ohio EPA

Re: Sancap Abrasives, Inc.
#02-26-0341



June 21, 1983

Mr. Ronald Kron
Sancap Abrasives, Inc.
16123 Armour Street N.E.
Alliance, Ohio 44601

Dear Mr. Kron:

OHDO93289700

STATUS 0

On May 25, 1983, Melinda Merryfield-Becker and I conducted a reinspection of the Sancap Abrasives, Inc. facility to determine compliance with violations noted during the February 14, 1983, RCRA inspection. You, Mr. Jim Sheil, Mr. Rudi Goldi, and Mr. James Huff represented Sancap Abrasives, Inc. during the reinspection.

During the reinspection, Mr. Huff described to us the emissions and waste products generated by Sancap Abrasives, Inc. This discussion included chemical analyses of seven waste streams generated by the facility. These seven waste streams include:

1. Process Wastewater - Wash water from cleaning of process equipment includes some resins and adhesives. Wastewater is collected in a holding pond before discharge to a POTW. This waste stream has been tested for EP Toxicity and deemed non-hazardous.
2. Adhesive Waste - This is a water-based, non-ignitable waste generated in cap-liner production. Original products included tolulene, but have been changed since February 14, 1983. This waste stream is now non-hazardous.
3. Epoxy Resin - This resin contains a substantial solvent content and is hazardous because of ignitability when placed in waste drums. After placement in drums, this material solidifies with no treatment polymerizing any solvents into the solid matrix. These drums will now be closed and sealed immediately after placing material inside. Waste epoxy resin is disposed of as a non-hazardous solid waste.
4. Urea Formaldehyde Resin - This resin, which contains 1% isopropal alcohol, solidifies with no treatment in closed drums prior to disposal as a non-hazardous solid waste.
5. Phenolic Resin - This resin contains no Subpart D solvents and from preliminary flashpoint tests is not ignitable (F.P. > 195°F). Waste resin is heated in 55 gallon drums to solidify the waste but does not constitute treatment since the waste resin is non-hazardous. Your

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JUN 27 1983
WASTE MANAGEMENT
BRANCH

June 21, 1983

facility has agreed to continue testing this material to ensure that there is no variability in the analysis for ignitability of this waste stream.

6. Spent Solvents - A variety of solvents are utilized by your facility to clean process equipment. Waste solvents are sent by your facility to a permitted solvent recycler.
7. Grind Waste - This waste stream is an ignitable hazardous waste generated from the cap liner production.

According to this information, the treatment processes mentioned during the February 14, 1983, inspection do not classify as treatment of hazardous waste. Since there is no on-site treatment of hazardous waste and all hazardous wastes are disposed of in less than 90 days, as verified by manifests, Sancap Abrasives, Inc., qualifies as a generator only of hazardous waste.

The reinspection of this facility indicates that Sancap Abrasives, Inc. is now in compliance with the applicable Ohio Hazardous Waste generator regulations OAC 3745-50 through 3745-52 and Federal Hazardous Waste generator regulations 40 CFR 260-262.

Please forward to my attention representative analyses of the phenolic resin, as testing continues, to confirm the non-hazardous characteristics of this waste.

If you have any questions, please feel free to contact our office or Mr. James Mayka, of the U.S. EPA - Region V at (312) 886-7443.

Yours truly,



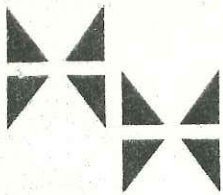
Rodney Beals
Environmental Scientist
Division of Hazardous Materials Management
Northeast District Office

RB:km

cc: Paula Cotter, DHMM, Central Office
Ken Westlake, U.S. EPA - Region V

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WASTE MANAGEMENT
BRANCH



HUFF & HUFF, INC.

Environmental Consultants

Suite 18, 140 N. La Grange Road, La Grange, Illinois 60525 • (312) 579-5940

June 17, 1983

Mr. Rodney Beals
Environmental Scientist
Division of Hazardous Materials Management
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

Re: SANCAP Abrasives, Inc. 040093289700 G, P A
#02-76-0341
Response to April 8, 1983 letter

RECEIVED
JUN 23 1983

Dear Mr. Beals:

This letter is in response to your April 8, 1983 letter, regarding purported deficiencies with the handling of hazardous waste at SANCAP. This letter attempts to summarize SANCAP's position with the various points raised in your letter, which were also verbally presented to Melinda Becker and yourself at a meeting held May 25, 1983 at SANCAP.

Prior to addressing the specific points raised in your letter, a background section is presented herein to clarify the waste streams at SANCAP. Then, each of the sixteen "violations" you noted will be specifically addressed.

WASTE STREAMS AT SANCAP

SANCAP has two major manufacturing lines at the Alliance, Ohio Plant, coated products and coated abrasives. In the coated products area, cap liners and sealants for consumer products are produced. In the coated abrasives area, various types of sandpaper are produced. A total of eight waste streams were identified at SANCAP that were of potential concern with respect to the hazardous waste regulations. These eight waste streams are described below along with our interpretation as to their status under the regulations.

1. Process Wastewater - At the end of a production run in the coated abrasives area, the coating equipment and coating tanks are cleaned prior to the next formulation. For all product mixes, the blending tanks are washed with an alkaline aqueous solution. The coating equipment is primarily cleaned with this same solution, although there are a few product lines when solvents (cellosolve solvent and on occasion, methanol) are utilized instead of the aqueous solution. This process waste stream is collected in four sumps and pumped to the earthen lagoons, and thence to the sanitary sewer to the POTW. No Subpart D wastes are sewered, although the resin mixes that are cleaned up do contain some solvent (described in following sections). Based upon our knowledge of the process, we declared this waste non-hazardous.

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6/28/83

In addition to the process wastewater from the coated abrasives area, which amounts to approximately 3,000 gpd, an average 100 gallons per day of wastewater from the treatment of adhesive wastes (described next) is discharged to one of the sumps (in the coated abrasives area) and thence to the pond. The ponds are frequently checked for pH, and are always between 2 and 12.5 (typically between pH 9 and 10). The wastewater has a flash point greater than its boiling point and it is clearly not a reactive waste. A multiple grab sample from the perimeter of a pond was taken on May 10, 1983, and analyzed for heavy metals by Wadsworth Laboratory, with the following result:

Parameter	Process Wastewater from Pond Concentration, mg/l
Arsenic	< .005
Barium	1.9
Cadmium	< .01
Chromium, Total	0.34
Lead	0.2
Mercury	< .005
Selenium	< .01
Silver	< .01

As SANCAP does not handle any of these metals in the plant, the low results are consistent with our knowledge of the process. Based upon the above description, we concluded that the wastewater is not hazardous, and therefore the ponds and sumps are not hazardous waste treatment facilities.

2. Adhesive Wastes - In the coated products area various adhesives are used to bond two substrates together. At the end of a production run, any excess adhesive is drummed, and becomes a waste. None of the adhesives utilized are Subpart D wastes. Reviewing the material safety data sheets, none of these adhesives (which include several animal hide glues) exhibit any of the Subpart C characteristics. A review of the adhesive formulations revealed that toluene is added to one adhesive for thickening purposes, at a level of 3%. Since your inspection, this single waste adhesive was handled as a hazardous waste until ignitability tests demonstrated a closed cup flash point greater than 170°F. Through reformulation efforts, the need for a solvent in this adhesive has been eliminated, thus eliminating all solvents in adhesive wastes.

The (non-hazardous) adhesive wastes are acidified to a pH between 2 and 6, resulting in breaking the emulsion, with the adhesive material separating from the water. The drums are then brought over to coated abrasives area where the water phase is discharged to a sump going to the pond, and the solidified adhesive is disposed of as a non-hazardous industrial waste.

3. Epoxy Resin Waste - This is one of three resins utilized in the manufacture of sandpaper. The epoxy resins are self-hardening. At the end of a production run, any remaining epoxy resin in the coating pan is quickly drummed. The drummed lid is installed and the resin solidifies to one solid mass within hours of being placed in the drum. At this point the epoxy resin waste is not a "liquid" and "is not capable, under standard temperature and pressure of causing fire through friction, absorption of moisture or spontaneous chemical changes." Thus, once solidified, the waste is no longer an ignitable waste. The epoxy resin does not meet any other Subpart C characteristics, and is therefore, not a hazardous waste, once solidified.

The question then becomes, is the solidification process in a "closed" container, at ambient conditions, "treatment"? The definition of treatment states, "any method, technique, or process, designed to change the physical character..." (emphasis added). As the solidification is a characteristics of the waste at ambient conditions, and the process is not by design, this is clearly not treatment. This interpretation is fully consistent with the February 25, 1982, interim final amendments to RCRA which exempted from the requirements of the hazardous waste management regulations, the acts of adding absorbent material to hazardous waste in containers at the time the waste is first placed in the container. In SANCAP's case, they are achieving the same physical change (liquid to a solid) without the need for adding an absorbent. Clearly if adding an absorbent to achieve a solid is not treatment, then merely allowing a waste to solidify on its own cannot be considered treatment.

4. Urea Formaldehyde Resin Waste - This is the second resin utilized in the coated abrasives area at SANCAP, and like the epoxy resin, is self-hardening. The urea formaldehyde resin, as purchased, has a closed cup flash point of $>203^{\circ}\text{F}$. The actual coating as applied is an aqueous solution with 1% isopropyl alcohol added for viscosity control. At the end of a production run, any excess urea formaldehyde resin is drummed where it will also solidify within hours in a "closed" container.^{a/}

As the resin without the isopropyl alcohol has a flash point substantially greater than 140°F , and "aqueous solutions containing less than 24% alcohol" are not ignitable wastes, this waste is clearly not hazardous.

5. Phenolic Resin Waste - The phenolic resins, as purchased, have closed cup flash points greater than 212°F . For viscosity control, typically 1% cellosolve solvent (ethylene glycol monoethyl ether) is added when preparing the coating mixture. We have tested 1% to 2% cellosolve solvent in the phenolic resins and the closed cup flash point in all samples were greater than 175°F . As this is not a Subpart D listed waste and does not meet any of the characteristics of Subpart C, it is not a hazardous waste.

a/ Unlike the epoxy resins that can be solidified in a sealed container, there is a slight pressure build-up when the urea formaldehyde resins solidify, so the container is not sealed, but the lid is placed on the drum.

The phenolic resins are heat catalyzed. The drums of excess resin are placed in the ovens and heated to the point that polymerization occurs, resulting in a solid mass of resin. At this point the wastes are disposed of as non-hazardous industrial wastes.

6. Spent Solvent from Coated Products Area - At the end of a production run in the coated products area, any excess coating solution is drummed for reuse. The coating equipment is then cleaned with a solvent, primarily methyl ethyl ketone (MEK). The spent solvent, which will contain some coating material (primarily waxes), is placed in a drum and handled as a hazardous waste. The sewer piping leading to the ponds does not extend into the coated products area, thus it is virtually impossible for the spent solvents from this area to get into the ponds even in the event of a spill.

7. Spent Solvent from Coated Abrasives Area - Two solvents are utilized at the end of certain production runs (water is used after most production runs) to clean up the roll coating equipment. Cellosolve solvent (ethylene glycol monoethyl ether) is the principal solvent utilized, and the resulting spent solvent is a Subpart C waste (ignitable). On occasion, methanol is utilized as a final cleaning on the rolls, and the solvent is drummed along with the cellosolve solvent, and handled as a hazardous waste.

A spill of either solvent in the abrasives area would be captured in one of the sumps. These sumps must be manually pumped to the ponds, so it is unlikely a major spill of solvent would even reach the ponds. While there is a potential for minor amounts of spent solvents to reach the sumps and ponds undetected from operator error, it should be noted that this would not automatically make the pond water a hazardous waste. First cellosolve solvent is not a Subpart D waste and mixtures of F003 wastes (methanol) are subjected to the ignitability test. Thus, their presence in the wastewater would not automatically make the wastewater hazardous.

8. Excess Coating Mixture from Coated Grind Waste - One product in the coated products area cannot be reused because of the formation of a precipitate. The excess coating mixture is drummed and handled as a hazardous waste because of its solvent content. Approximately 100 gallons per year of this hazardous waste are generated.

In summary, SANCAP has identified eight potential hazardous waste streams, of which our analysis indicates three waste streams are indeed hazardous and five are non-hazardous. On June 25, 1982, SANCAP requested to be declassified as a storer of hazardous waste and we formally closed our facility on January 20, 1983. The U.S. EPA approved our request on March 22, 1983, and we have operated as a generator only since this date. After receiving your April 8, 1983 letter, we re-examined our status, and feel no change is in order. SANCAP is a generator, does not treat hazardous waste and no longer requires to be a storer of hazardous waste.

RESPONSE TO THE SPECIFIC "VIOLATIONS" NOTED IN THE APRIL 8, 1983
LETTER FROM OEPA

As should be apparent from the background section, your understanding of SANCAP's operation was not totally accurate. Many of the "violations" reported are requirements applicable to "TSD" facilities, which SANCAP is not, nor required to be, because of any hazardous waste treatment activities. The following are responses to the specific issues you raised:

1. Detailed chemical and physical analyses of the adhesive and urea formaldehyde resin, as required by 40 CFR 265.13 (a) and 3745-65-13 (A).

As discussed extensively above, neither of these two waste streams are hazardous wastes. This requirement pertains to "TSD" facilities handling hazardous waste. SANCAP is not a "TSD" facility.

2. Detailed chemical and physical analyses of solified adhesives and resins in storage.

Same comments as under #1.

3. Chemical and physical analysis of wastewater and lagoon sediment

As described previously, the spent solvents, which are dunned, are the only Subpart D wastes at SANCAP. The wastewater may contain a small amount of solvents from the manufacturing process at SANCAP; however, the presence of solvents in the wastewater does not automatically make the wastewater stream hazardous. (See Attachments 1 and 2 from the U.S. EPA Report "Hazardous Waste Management - A Guide to the Regulations.") In accordance with 40 CFR 262.11(c)(2), we applied "knowledge of the hazard characteristic of the waste in light of the materials or the processes used, "to determine the wastewater was not hazardous. SANCAP does not utilize any materials that contain heavy metals listed in Subpart C, nor does SANCAP handle

reactive materials. The wastewater certainly is not "ignitable" and the pH of the wastewater entering the lagoon has a pH between 2.0 and 12.5.

Based upon your request, SANCAP did analyze the lagoon water for heavy metal content, and the results were presented in the previous section of this report. These results confirmed our contention that there is no metal contamination and the wastewater is not a hazardous waste.

4. Amend the Waste Analysis Plan

As a Generator only of hazardous waste, SANCAP is not subject to the requirements of 40CFR 265.13(b) or 3745-65-13(B), and is, therefore, not required to even have a waste analysis plan. That SANCAP has a waste analysis plan demonstrates our effort to handle hazardous wastes in a responsible manner.

5. Gate behind facility must be locked

This requirement pertains to TSD facilities (40CFR 265.14 and 3745-65-14(B)), not to Generators. SANCAP is not a TSD facility.

6. Inspection Plan must include daily inspections of loading and unloading areas

This requirement pertains to TSD facilities. SANCAP, as a Generator that stores drums for less than 90 days, must comply with 40 CFR 265 Subpart I. Weekly inspections of the hazardous waste drum storage area is required under 40CFR 265.174. The requirement of 40CFR 265.14 and 3745-65-14(B) are applicable only to TSD facilities.

7. Facility personnel associated with the handling of hazardous materials must be trained

We are unaware of any requirement to instruct personnel associated with hazardous materials in hazardous waste management. The regulations pertain to hazardous waste not hazardous materials. All personnel that handle hazardous waste, which begins when the material is discarded, have been properly trained in accordance with 40 CFR 265.16(a) and 3745-65-16(D). Operators on the production lines have not been trained in hazardous waste management, because they do not handle hazardous waste. The material does not become a waste until it is discarded. It should be noted that SANCAP has a safety program that includes training seminars for all plant operators.

These personnel are trained in the safe handling of the chemicals utilized in our business. Attachment 3, taken from the U.S. EPA Report "Hazardous Waste Management - A Guide to the Regulations," is consistent with our position on this point.

8. Maintain records for all employees who handle hazardous waste

SANCAP has maintained records of who has been trained and their job titles. The additional requirements under 40CFR 265.16(d) and 3745-65-16(D) have been fulfilled since your letter dated April 8, 1983.

9. Signs posted at each entrance

This requirement (40CFR 265.14(C) and 3745-65-14(C) pertains only to TSD facilities. SANCAP is not a TSD facility. SANCAP does have the "Danger" sign posted on the building where hazardous wastes are stored (for less than 90 days), and we have posted signs at the entrances.

10. All areas where full drums of spent adhesive, spent resin, or spent solvents are settling are considered storage areas and are subject to all regulations pertaining to the storage of hazardous waste

You refer to 40CFR 265.17 and 3745-65-17, which pertain to TSD facilities. SANCAP is not a TSD facility and as described previously, the spent resin and spent adhesives are not hazardous wastes. SANCAP manages the storage of hazardous waste in full compliance with 40CFR 265 Subpart I.

11. Contingency Plan must include arrangements agreed to by local police, fire, hospitals, and other emergency response authorities to coordinate emergency services

40CFR 265.53 includes the following limitation with respect to arrangements with local authorities, "that may be called upon to provide emergency service." Over the past 16 years, SANCAP has had only 2 emergencies that required the fire department, 0 emergencies requiring police, and 1 emergency requiring hospitals with respect to the handling of chemicals, hazardous waste, fires, etc.

Since receipt of your letter we have transmitted copies of the emergency response plan to the local fire department, and hospital, as well as the Ohio EPA.^{b/} The local fire department inspected our facility in 1981 and again on June 15, 1983 to familiarize themselves with the layout of the facility, the chemicals handled at SANCAP and

b/ See Attachments IV, V, and VI.

other potential hazards, and the evacuation routes. The 1981 inspection is duly noted in the Emergency Response Plan and the 1983 inspection will be noted when the Plan is again revised.

12. The operator must maintain a written operating record in accordance with 40CFR 265.73 and 3745-65-73

This requirement refers to TSD facilities. SANCAP is a Generator only.

13. The owner must establish financial assurance for closure (40CFR 265.143)

This requirement refers to TSD facilities. SANCAP is a Generator only.

14. Containers holding hazardous waste must always be enclosed during storage

SANCAP is now complying with this requirement.

15. During the inspection, drums containing dried resins or adhesives were found in drums in poor physical condition

The contents in these drums have been transferred to drums in good condition and hauled off-site as hazardous waste in an effort to eliminate these material as quickly as possible.

16. Storage areas must be inspected weekly, and documented

SANCAP has had a written inspection plan since April, 1981. A program has now been instituted at SANCAP to assure that these inspections are conducted on a weekly basis, which is consistent with the inspection plan.

I trust the above comments clarify the operating practices at SANCAP, and request that this letter become part of the official records of the Ohio EPA's Division of Hazardous Materials Management. We appreciated the opportunity to present our position to Melinda Becker and you on May 25, 1983, and believe this letter accurately reflects the information verbally presented.

The Ohio EPA has not acted upon SANCAP's request to declassify as a storage facility to date. We hope that this letter will satisfy your concerns and you will recommend our request be approved by the Hazardous Waste Facility Approval Board.

SANCAP has made a good faith effort to comply with these complex hazardous waste regulations, and we have already corrected the few deficiencies you accurately noted. As we described in the meeting, SANCAP has purchased a closed cup flash point apparatus and we are testing the waste resin drums to assure that the spent solvents are being properly segregated. SANCAP will forward these results to you periodically until we are satisfied that this segregation is indeed being achieved on a consistent basis.

Please do not hesitate to contact me or Jim Sheil at SANCAP if you have any additional questions.

Very truly yours,

HUFF & HUFF, INC.


James E. Huff, P.E.

JEH:djk

cc Paula Cotter, DHMM, Central Office, OEPA
Ken Westlake, U.S. EPA - Region V
Kathy Homer, U.S. EPA - Region V
Bruce Blankenship, Stark County Air Pollution
Control Agency

Rudi Goeldi, SANCAP
James Sheil, SANCAP

ATTACHMENT I

Is a waste a hazardous waste if it contains a commercial product listed in Section 261.33(f), but does not exhibit any of the four characteristics?

It is probably not a hazardous waste. If the waste is not listed as a hazardous waste, is not a mixture containing a listed hazardous waste, and does not exhibit any of the four characteristics, it is not a hazardous waste by virtue of containing a commercial product listed in Section 261.33(e) or (f) unless the commercial product was discarded by mixing it into the waste.

solvents
spent

ATTACHMENT II

Are the spent solvents listed in Section 261.31 generated by specific processes, or are any materials that contain these solvents considered hazardous?

The spent solvents listed in Section 261.31 cover spent solvents generated by any and all processes; hence they are not limited to spent solvents derived from specific processes.

These listed spent solvents themselves are hazardous wastes. Also, any solid waste with which these listed spent solvents are mixed are hazardous wastes. Solid wastes that may contain some amounts of solvents from the manufacturing or other activity in which the solvents are used are not, however, hazardous wastes by virtue of their solvent content; they may, however, be hazardous wastes for other reasons.

identification and
listing

If an industrial plant has on-site facilities to treat hazardous wastes, do the training requirements of Section 265.16 extend to personnel in the production unit?

No. The training requirements apply only to personnel involved in those aspects of the facility's operation that relate to the management of hazardous waste.

May 17, 1983

Lester Barber, Fire Chief
Lexington Township Fire Department
14555 Gaskill Dr. N.E.
Alliance, Ohio 44601

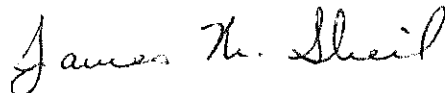
Dear Mr. Barber:

Attached you will find a copy of SANCAP Abrasives, Inc. "Environmental Incident Control Plan". This plan was developed to assist and protect all involved people in the event of a chemical spill, fire, etc. The plan includes several attachments, one of which has the Material Safety Data Sheets for our stored chemicals. This copy of the plan is for your use in the event we require your assistance.

In addition to giving you this plan, we would also like to ask for your assistance in picking a self-contained breathing unit for use in our plant. We will be purchasing a unit in the near future and would like to discuss such items as inspection of the unit, refilling the unit, etc. Your help would be appreciated.

Thank you in advance for your help and assistance.

Sincerely yours,



James M. Sheil
Plant Engineer

JMS/cw

cc: R. Goeldi
R. Kron
J. Huff

June 6, 1983

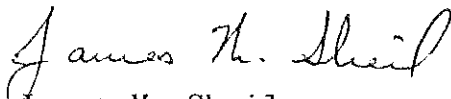
Mrs. Pat Felger
Risk Management Office
Alliance City Hospital
264 E. Rice
Alliance, Ohio 44601

Dear Mrs. Felger:

Attached you will find a copy of SANCAP Abrasives, Inc. "Environmental Incident Control Plan". This plan was developed to assist and protect all involved people in the event of a chemical spill, fire, etc. The plan includes several attachments, one of which has the Material Safety Data Sheets for our stored chemicals. This copy of the plan is for your use in the event we require your assistance.

Thank you for your help and assistance.

Sincerely yours,



James M. Sheil
Plant Engineer

JMS/cw

cc: R. Goeldi
R. Kron
J. Huff

June 6, 1983

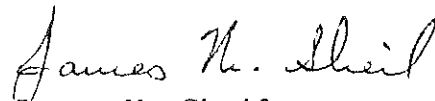
Ohio E.P.A. Emergency Response Center
P. O. Box 1049
361 East Broad Street
Columbus, Ohio 43216

Dear Sirs:

Attached you will find a copy of SANCAP Abrasives, Inc. "Environmental Incident Control Plan". This plan was developed to assist and protect all involved people in the event of a chemical spill, fire, etc. The plan includes several attachments, one of which has the Material Safety Data Sheets for our stored chemicals. This copy of the plan is for your use in the event we require your assistance.

Thank you.

Sincerely yours,



James M. Sheil
Plant Engineer

JMS/cw

cc: R. Goeldi
R. Kron
✓ J. Huff

status 7
Ohio EPA

Re: Sancap Abrasives, Inc.
#02-76-0341

OHD093289700

April 8, 1983

Mr. Ronald Kron
Sancap Abrasives, Inc.
16123 Armour Street N.E.
Alliance, Ohio 44601

Dear Mr. Kron:

On February 14, 1983, Steve Tuckerman and I conducted an inspection of the Sancap Abrasives, Incorporated facility located at 16123 Armour Street N.E., Alliance, Ohio, to determine compliance with both State and Federal hazardous waste regulations. You represented Sancap Abrasives, Incorporated during this inspection. A copy of the inspection report is enclosed for your information.

It is my understanding that three potentially hazardous waste streams are produced at Sancap Abrasives, Incorporated: 1) F005 waste solvents, 2) adhesive waste, 3) urea formaldehyde waste.

Spent solvents are sent to a solvent reclaimer for recycle use. The adhesive waste produced in the cap liner production is ignitable and is possibly mixed with some F005 waste solvent from cleaning of process lines. The adhesive waste is acidified in drums which causes the adhesives to solidify. The liquid fraction is decanted from the drums and discharged to the sewer system. Solvents are allowed to evaporate from the remaining adhesive waste and the resultant solid material is disposed of as a solid waste. Spent urea formaldehyde resin is an ignitable waste produced in sandpaper production. Spent resin is placed in drums and heated in a dryer oven. By drying the waste resin, solvents are evaporated and the waste resin is solidified. This waste is also disposed of as a solid waste.

Since both the adhesive and resin are characteristically ignitable and may be mixed with F005 solvents from cleaning operations they would be considered as hazardous wastes (40 CFR 261.3). The management practices by Sancap Abrasives, Inc., allowing solvent evaporation from the two waste streams, constitutes treatment. Treatment as defined in 40 CFR 260.10 and 3745-50-10 is "any method, technique, or process designated to change the physical or chemical composition of any hazardous waste as to render such waste non-hazardous or less hazardous."

Sancap Abrasives' current Hazardous Waste Installation and Operation Permit does not permit treatment of hazardous wastes at this facility. All treatment activities should be terminated until the proper permits are obtained.

DD

April 8, 1983

Although Sancap Abrasives has requested to withdraw from its permit for storage of hazardous wastes, this permit has not yet been terminated. Therefore, Sancap Abrasives is still subject to the operational requirements of a hazardous waste storage facility. Because of the poor operating procedures at the facility, we were unable to verify the status of your facility. You may wish to re-evaluate your withdrawal request if the termination of the unpermitted hazardous waste treatment operation will result in increased storage of hazardous wastes at your facility.

We inspected Sancap Abrasives for both Federal and Ohio Operational requirements for hazardous waste storage facilities. The following violations were noted:

1. Detailed chemical and physical analyses of the adhesive and urea formaldehyde resin are needed to document hazardous characteristics and solvent content of these hazardous wastes (40 CFR 265.13 (a) and 3745-65-13 (A)). This information is necessary to ensure proper storage and disposal of the materials.
2. Detailed chemical and physical analyses of solidified adhesives and resins in storage at your facility are needed to ensure proper disposal of these wastes (40 CFR 265.13 (a) and 3745-65-13 (A)).
3. Presently, the washwater generated by your facility is stored in a surface impoundment prior to discharge to the Alliance Wastewater Treatment Plant. Currently, the wastewater is analyzed for pH only. A chemical and physical analyses should be conducted on this wastewater including analysis for EP Toxicity and solvents listed in 40 CFR 261.3 III A & B and OAC 3745-51-03 (i) & (ii). Sediments in the surface impoundment and intermediate collection areas should be analyzed for EP Toxicity at minimum (40 CFR 265.13 (a) and OAC 3745-65-13 (A)).
4. The written waste analysis plan used by your facility needs to be amended to include analytical parameters tested, sampling methods, and testing frequencies (40 CFR 265.13 (b) and 3745-65-13 (B)).
5. During operating hours, a gate behind your facility is open to allow the entry of delivery trucks. Precautions should be initiated to ensure controlled entry through this gate (40 CFR 265.14 and 3745-65-14 (B)).
6. Amendments to your written inspection schedule must include daily inspections of loading and unloading areas when in use (40 CFR 265.15 (b) and 3745-65-15 (B)). The schedules included in your inspection plan must be followed on a regular basis and recorded.
7. All facility personnel associated with the handling of hazardous materials must be trained or instructed in hazardous waste management procedures (40 CFR 265.16 (a) and 3745-65-16 (A)).
8. The facility must maintain records for all employees who handle hazardous waste to include job titles, job descriptions, and documented training records (40 CFR 265.16 (d) and 3745-65-16 (D)).
9. The facility must have a sign "Danger - Unauthorized Personnel Keep Out" at each entrance to the facility (40 CFR 265.14 (c) and 3745-65-14 (c)).

April 8, 1983

10. The facility must have "No Smoking" or "No Open Flame" signs near areas where ignitable wastes are handled and stored (40 CFR 265.17 and 3745-65-17). All areas where full drums of spent adhesive, spent resin, or spent solvents are settling are considered storage areas and are subject to all regulations pertaining to the storage of hazardous wastes.
11. The Contingency Plan must include arrangements agreed to by local police departments, fire departments, hospitals, and other emergency response authorities needed to coordinate emergency services (40 CFR 265.52 (c) and 3745-65-52 (C)). A copy of the Contingency Plan must be submitted to each of these authorities (40 CFR 265.53 and 3745-65-53).
12. The operator must maintain a written operating record at the facility which includes the description and quantity of each hazardous waste being stored and the present physical location of each within the facility. Other information needed in the operating record includes the common name, the EPA Hazardous Waste Identification Number, the physical state, and the description of storage and disposal methods for each waste (40 CFR 265.73 and 3745-65-73).
13. The owner or operator of the facility must establish financial assurance for closure of the facility (40 CFR 265.143).
14. Containers holding hazardous waste must always be enclosed during storage, except when it is necessary to add or remove waste (40 CFR 265.173 and 3745-66-73). This pertains to drums of wastes in all potential storage areas throughout your facility.
15. During the inspection, drums containing dried resins or adhesives were found in the unheated warehouse. Many of these drums were in poor physical condition. If a container holding hazardous waste is not in good physical condition, the hazardous waste from this container must be transferred to a container in good physical condition (40 CFR 265.171 and 3745-66-71).
16. Storage areas must be inspected at least weekly, looking for leaks or deterioration of drums (40 CFR 265.174 and 3745-66-74). This must be documented for all storage areas within the facility.

The wastewater and sediments in your facility's holding pond must also be tested for hazardous waste characteristics. Permit modifications may be necessary if either the wastewater or sediments are determined to be hazardous. As we discussed during the inspection, I would like to be present at the time samples are taken to obtain split samples for possible analysis by the Ohio EPA.

Since Sancap Abrasives, Incorporated does not qualify as a generator facility only, the annual \$1500 permit fee must be submitted to Mr. Tom Crepeau, Permits and Manifests Records Section, Division of Hazardous Materials Management, Ohio EPA, P.O. Box 1049, 361 East Broad Street, Columbus, Ohio, 43215.

This inspection report will become a part of the official records of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management and will be forwarded to Ms. Kathy Homer, U.S. EPA - Region V.

The violations should be corrected within 30 days. Please notify me when you plan to sample the holding pond.

Re: Sancap Abrasives, Inc.
#02-76-0341
Page 4

April 8, 1983

Please contact our office or Ms. Kathy Homer at (312) 866-7435, if you have any questions or problems.

Yours truly,



Rodney Beals
Environmental Scientist
Division of Hazardous Materials Management
Northeast District Office

RB:km

Enclosure

cc: Paula Cotter, DHMM, Central Office
Ken Westlake, U.S. EPA - Region V
Bruce Blankenship, Stark County Air Pollution Control Agency

2/14/82 10:30-11:30
Date a Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

PART I. GENERAL INFORMATION

U.S. EPA I.D. # 093289700
HMFAB # 02-76-0341

Facility: Sancap Abrasives, Inc. Address: 16123 Armour Street N.E. City: Alliance
State: Ohio Zip Code: 44601 County: Stark Telephone: (216) 821-3570

INSPECTION PARTICIPANTS(S)

	(Name)	(Title)	(Telephone)
1.	<u>Rowald Kron</u>	<u>Plant Manager</u>	<u>(216) 821-3570</u>
2.			
3.			
1.	<u>Robbery Beals</u>	<u>Environmental Scientist</u>	<u>(216) 425-9171</u>
2.	<u>Steve Tuckerman</u>	<u>Environmental Scientist</u>	<u>(216) 425-9171</u>
3.			

INSTALLATION ACTIVITY

If the site is a TSDF, check the boxes indicating which regulations are applicable.

Mark One	<input type="checkbox"/> Generator only (G)	<input checked="" type="checkbox"/> General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure	<input type="checkbox"/> Waste Piles S03
	<input type="checkbox"/> Transporter (T)		<input type="checkbox"/> Land Treatment D81
	<input type="checkbox"/> TSDF only		<input type="checkbox"/> Landfills D80
	<input type="checkbox"/> G-T		<input type="checkbox"/> Chemical/Physical/Biological T04
	<input checked="" type="checkbox"/> G-TSDF		<input type="checkbox"/> Groundwater Monitoring
	<input type="checkbox"/> T-TSDF		<input type="checkbox"/> Post-Closure
	<input type="checkbox"/> G-T-TSDF		

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
<u> </u>	<u>✓</u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>

REMARKS, PART 1. GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Manufacture of coated abrasives and coated products.

*Wastes: F005 - Methanol, Toluene, MEK, MIB, Carbon Disulfide
D001 - Ignitable*

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 (statutory exclusions) or Section 261.6 (recycle/reuse)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

5. The generator meets the following hazardous waste pre-transport requirements:
 - a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))
 - b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b).
 - c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50.
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34, the following requirements with respect to such storage are met:
 - a) The containers are clearly marked with the words "Hazardous Waste".
 - b) The date that accumulation began is clearly marked on each container.
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Section 262.34).
9. The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34).

Yes	No	N/A	Remark #
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>only covered train</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>seminar</i>

RCRA INTERIM STATUS INSPECTION FORM

NOTE : SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency
E: Manifest/Records/Reporting
G: Closure
H: Financial Requirements

Subpart B: General Facility Standards

	Yes	No	N/A	Remark #
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a)(1).	—	✓	—	—
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	—	✓	—	not complete
3. a) Physical contact with the waste structures or equipment will not injure unknowing/unauthorized persons or livestock entering the facility (265.14(a)(1)).	—	✓	—	—
b) Disturbance of the waste will not cause a violation of the hazardous waste regulations (265.14(a)(2)).	—	✓	—	—
IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".	—	—	—	—
4. The facility has -	✓	—	—	—
a) A 24-hour surveillance system, or	—	—	—	—
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)).	—	✓	—	* comment

* the facility is enclosed by a fence, but a gate behind the plant is open daily for deliveries.

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265.14(c))	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
6. a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15)	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4))	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records.	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Section 265.17).				
a) Protection from sources of ignition.	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
b) Physical separation of incompatible waste materials.	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u> </u>	<u> ✓ </u>	<u> </u>	<u> </u>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b).	<u> ✓ </u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) ✓

2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)
 - a) Internal alarm system. ✓
 - b) Access to telephone, radio or other device for summoning emergency assistance. ✓
 - c) Portable fire control equipment. ✓
 - d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers. ✓

3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) ✓

4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) ✓

5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) ✓

6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) ✓ only fire Dept.

7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) ✓

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident.
 - b) Arrangements or agreements with local or state emergency authorities.
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
 - d) A list of all emergency equipment including location, physical description and outline of capabilities.
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53)
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56)
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56.

Yes	No	N/A	Remark #
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RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 which contains the following information:

- | | | | |
|---|-------------|-------------|-------------|
| a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1)) | <u> </u> | <u> </u> | <u> </u> |
| b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s). | <u> </u> | <u> </u> | <u> </u> |
| c) The estimated (or actual) weight, volume or density of the waste material(s). | <u> </u> | <u> </u> | <u> </u> |
| d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980). | <u> </u> | <u> </u> | <u> </u> |
| e) The present physical location of each hazardous waste within the facility. | <u> </u> | <u> </u> | <u> </u> |
| f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) | <u> </u> | <u> </u> | <u> </u> |
| g) Records of any waste analyses and trial tests required to be performed. | <u> </u> | <u> </u> | <u> </u> |
| h) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B). | <u> </u> | <u> </u> | <u> </u> |
| i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). | <u> </u> | <u> </u> | <u> </u> |
| j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G. | <u> </u> | <u> </u> | <u> </u> |

RCRA INTERIM STATUS INSPECTION FORM

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75.

Yes No N/A Remark #

✓ — — —

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)

✓ — — —

- a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))

— — ✓ —

- b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2))

— — ✓ —

4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director.

— — ✓ —

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days.

— — ✓ —

Subpart G: Closure and Post-Closure

NOTE : THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112)

✓ — — —

- a) A description of how and when the facility will be closed. (265.112(a)(1)).

✓ — — —

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A description of steps taken to decontaminate facility equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e) The year closure is expected to begin and a schedule for the various phases of closure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a) A closure trust fund, or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) A surety bond, or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) A closure letter of credit, or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) A combination of financial mechanisms.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NOTE : COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

RCRA INTERIM STATUS INSPECTION FORM

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

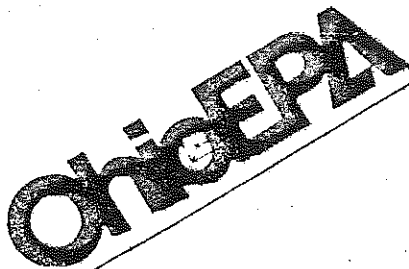
PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers
 J: Management of Tanks
 K: Surface Impoundments
 L: Waste Piles
 M: Land Treatment
 N: Landfills
 O: Incinerators
 P: Thermal Treatment
 Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b) In good physical condition (265.171)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c) Compatible with the wastes stored in them (265.172)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Hazardous waste containers are not stored, handled or opened in a manner which may rupture the container or cause it to leak. (265.173(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner. (265.177(c))	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



Re: Application Number 81-HW-0341
Stark County

August 24, 1981

RECEIVED

AUG 27 1981

WASTE MANAGEMENT BRANCH
EPA, REGION 5

Ronald J. Kron
Plant Manager
Sancap Abrasives, Inc.
16123 Armour Street N.E.
Alliance, Ohio 44601

Dear Mr. Kron:

On July 16, 1981, Robert E. Buda of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Ronald J. Kron.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Robert E. Buda, SEDO

CERTIFIED MAIL

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

SANCAP ABRASIVES, INC.

FACILITY NO. - 81-HW-0341

OWNER - Sandcap Abrasives Inc.

FACILITY NAME - Sandcap Abrasives Inc.

FACILITY LOCATION - 16123 Armour St. N

FACILITY CONTACT - Ronald J. Kron, Plant Manager

PHONE NO. - (216) 821-35

ISS INSPECTION DATE - 7-16-81

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13			
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"			
	D 1	3745-55-15	265.15			
4	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16	B	✓	
	2	"	"	B	✓	
	3	"	"	B	✓	
5	4	"	"	B	✓	
	5	"	"	B	✓	
	6	"	"	B	✓	
	F 1	3745-55-17	265.17			
	2	"	"			
	3	"	"			
	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32	B		
	2	"	"			
	3	"	"			
6	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	A 2	3745-55-52	265.52			
	3	"	"			
	4	"	"			
	5	"	"			
7	B 1	3745-55-53	265.53			
	C 1	3745-55-55	265.55			
	2	"	"			
	3	"	"			
	D 1	3745-55-56	265.56			
	VI A 1	3745-55-71	265.71			
	2	"	"			
	B 1	3745-55-72	265.72			
8	C 1	3745-55-73	265.73			
	2b	"	"			
	c	"	"			
	d	"	"			
	e	"	"			
	f	"	"			
	g	"	"			
9	VII A 1	3745-56-03	265.112			
	2	"	"			
	3	"	"			
	4	3745-56-32	265.142	B		
	B 1	3745-56-09	265.118			
	VIII I 1	3745-56-51	265.171			
	2	3745-56-52	265.172			
	3	3745-56-53	265.173			
	4	"	"			
	5	3745-56-54	265.174			
	6	3745-56-56	265.176			
10	7	3745-56-57	265.177			
	8	"	"			
	J 1	3745-56-72	265-192			
	2	"	"			
	3	"	"			
	4	3745-56-73	265-193			
	5	3745-56-74	265.194			
	6	3745-56-78	265.198			
	7	3745-56-79	265.199			
11	8	3745-56-78	265.198			
	K 1	3745-57-03	265.222			
	2	3745-57-04	265.223			
	3	3745-57-06	265.225			
	4	3745-57-07	265.226			
	5	"	"			
	6	3745-57-10	265.229			
	7	3745-57-11	265.230			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
		7	3745-57-37	265.257		
13	M	1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
		9	3745-57-62	265.282		
14	N	A	1	3745-57-72	265.302	
			2	"	"	
			3	"	"	
			4	"	"	
	B	1	3745-57-79	265.309		
			2	"	"	
	C	1	3745-56-03	265.112		
			2	"	"	
			3	"	"	
			4	3745-56-32	265.192	
	D	1	3745-57-82	265.312		
			3745-55-17	265.17(b)		
	E	1	3745-57-83	265.313		
			3745-55-17	265.17(b)		
			3745-57-84	265.314		
			2	"	"	
	G	1	3745-57-85	265.315		
			3745-57-85	265.315		
			3745-58-33	265.373		
			2	"	"	
	I	B	3	"	"	
			4	"	"	
			5	"	"	
			2a	3745-58-35	265.375	
16	II	A	1a	3745-58-35	265.375	
			b	"	"	
			c	"	"	
			2a	3745-58-35	265.375	
	B	1	b	"	"	
			1	"	"	
			2	"	"	
			3	"	"	
			4	"	"	
17			5	"	"	

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
	III A 1	3745-58-37	265.377			
	B 1	"	"			
	C 1	"	"			
	D 1	"	"			
	E 1	"	"			
	F 1	"	"			
	G 1	"	"			
18	IV A 1	3745-58-42	265.382			
	2	"	"			
	Q 1	3745-58-51	265.401			
	2	"	"			
19	3	3745-58-52	265.402			
	4	3745-58-53	265.403			
	5	3745-58-55	265.405			
	6	3745-58-56	265.406			
	IX I (A)	3745-52-40	262.40			
	(B) 1	3745-52-21	262.21			
	2	"	"			
20	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	3745-52-42	262.42			
	(C)	3745-52-30	262.30			
	2 (A)	3745-52-31	262.31			
	(B)	3745-52-33	262.33			
	(C)	3745-52-34	262.34			
21	3 1	"	"			
	2	"	"			
	3	3745-56-54	265.174			
	4a	3745-56-72	265.192			
	b	"	"			
	c	"	"			
	d	3745-56-74	265.184			
	e	3745-56-78	265.198			
	f	3745-56-79	265.199			
22	VI A	3745-52-40	262.40			
	B	3745-52-41	262.41			
	VII 1a	3745-52-50	262.50			
	b	"	"			
	c	"	"			
	2	"	"			
23 X	I	3745-53-22	263.22			
	II A	3745-53-20	263.20			
	B	"	"			
	V A	3745-53-10	263.10			
	B	3745-53-10	"			

KEY TO CODED ITEMS (COLI ' IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

SITE IDENTIFICATION NUMBER

87-HW-0341

OH D000371591
EPA IDENTIFICATION NUMBER

OH D093289760

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: SANCAP
SANCAP ABRASIVES INCORPORATED
- (B) Street: 16123 ARMOUR STREET, N.E.
- (C) City: ALLIANCE (D) State: OHIO (E) Zip Code: 44601
- (F) Phone: (216) 821-3510 (G) County: STARK (plant)
- (H) Operator: SAME
- (I) Street: _____
- (J) City: _____ (K) State: _____ (L) Zip Code: _____
- (M) Phone: _____ (N) County: _____
- (O) Owner: SAME
- (P) Street: _____
- (Q) City: _____ (R) State: _____ (S) Zip Code: _____
- (T) Phone: _____ (U) County: _____
- (V) Date of Inspection: 7-16-81 (W) Time of Inspection (From) 9AM (To) 11AM
- (X) Weather Conditions: CLOUDY. WARM

(Y) Person(s) Interviewed	Title	Telephone
<u>RONALD J. KRON</u>	<u>PLANT MANAGER</u>	<u>(216) 821-3510</u>
_____	_____	_____
_____	_____	_____
(Z) Inspection Participants	Agency/Title	Telephone
<u>ROBERT E. BUDA</u>	<u>OEPA / ENVIRONMENTAL</u>	<u>(216) 425-9171</u>
_____	<u>SCIENTIST</u>	_____
_____	_____	_____
(AA) Preparer Information		
Name	Agency/Title	Telephone
<u>ROBERT E. BUDA</u>	<u>OEPA / ES</u>	<u>(216) 425-9171</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><input checked="" type="checkbox"/> A. Storage and/or Treatment</p> <p>1. Containers (I)</p> <p>2. Tanks (J)</p> <p>3. Surface Impoundments (K)</p> <p>4. Waste Piles (L)</p> <p><input type="checkbox"/> B. Land Treatment (M)</p> <p><input type="checkbox"/> C. Landfills (N)</p> | <p><input type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P)</p> <p><input type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q)</p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<input type="checkbox"/>	<input type="checkbox"/>	<u>NA</u>	
2. Facility expansion?	<input type="checkbox"/>	<input type="checkbox"/>	<u>NA</u>	
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>VARIOUS WASTES ARE NOT MIXED</u>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>95% of the waste is MER from the COATED PRODUCTS</u> <u>THIS IS ON FILE</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Artificial or natural barrier around facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Controlled entry?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Danger sign(s) at entrance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>THESE ARE ON THE BUILDING</u> <u>that the spent solvents ARE IN.</u>
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Records of operator error?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Records of discharges?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>1 / WEEK</u>
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>1 / MONTH</u>
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>1 / WEEK</u>
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>2 EMPLOYEES ATTENDED</u>
2. Job descriptions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>A SEPARATE RECORDING</u>
3. Description of training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>THE HANDLING OF THESE</u>
4. Records of training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>WASTES. IT IS NOT NEW</u>
5. Have facility personnel received required training by 5-19-81?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>IN THEIR FILES, BUT THEY</u>
6. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>PLAN ON INCLUDING</u> <u>THIS INFORMATION, SHORTLY</u>
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI* Remarks

_____ ✓ _____

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

_____ ✓ _____

2. Telephone or 2-way radios at the scene of operations?

✓ _____

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

✓ _____

NOT IN HAZARDOUS WASTE BUILDING but just INSIDE the MAIN DOOR, APPROXIMATELY 50 FEET FROM the HAZARDOUS WASTE BUILDING.

Indicate the volume of water and/or foam available for fire control:

THERE IS A HOSE HOUSE 25 FEET FROM the HAZARDOUS WASTE BUILDING. WATER IS UNLIMITED

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

✓ _____

2. Is emergency equipment maintained in operable conditions?

✓ _____

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

✓ _____

- (E) Is there adequate aisle space for unobstructed movement?

✓ _____

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

- (A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓ _____

✓ _____

✓ _____

✓ _____

✓ _____

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	EVERY SHIPPED SOLVENT OFF ONCE IN THE PAST YEAR
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓ _____

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓ _____

- c. The location and quantity of each hazardous waste within the facility?

✓ _____

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓ _____

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

✓ _____

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓ _____ ESTIMATED COSTS

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is closure estimate available by May 19, 1981?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS (DRUMS, 55 GALLON)

Facility Name: SANDCAP ABRASIVES INCORPORATED Date of Inspection: 7-16-81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Do continuous feed systems have a waste-feed cutoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are required daily and weekly inspections done?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

Yes No NI* Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	-----
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	-----
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	-----
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	-----
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
7. Are piles of incompatible waste protected by barriers or distance from other waste?	---	---	---	-----

*Not Inspected

N
LANDFILLS

Facility Name: _____

Date of Inspection: _____

Yes No NI* Remarks

(A) General Operating Requirements
Does the facility provide the following:

**1. Diversion of run-on away from active portions of the fill? _____

**2. Collection of run-off from active portions of the fill? _____

**3. Is collected run off treated? _____

4. Control of wind dispersal of hazardous waste? _____

(**Effective 11-19-81)

(B) Surveying and Recordkeeping
Does the Operating Record Include:

1. A map showing the exact location and dimensions of each cell? _____

2. The contents of each cell and the location of each hazardous waste type within each cell? _____

(C) Closure and Post-Closure

1. Is the Closure Plan available for inspection by 5-19-81? _____

2. Has this plan been submitted to the Regional Administrator? _____

3. Has closure begun? _____

4. Is closure cost estimate available by 5-19-81? _____

(D) Special requirements for ignitable or reactive waste

Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive? _____

LAND TREATMENT

Facility Name: _____ Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(E) Special Requirements for Incompatible Wastes.				
Does the owner or operator dispose of incompatible wastes in separate cells?	_____	_____	_____	_____
If not, the provisions of 40 CFR 265.17(b) apply.	_____	_____	_____	_____
(F) Special requirements for liquid waste (effective 11-19-81)				
1. Are bulk or non-containerized liquids placed in the landfill?	_____	_____	_____	_____
2. Does the landfill have a chemically and physically resistant liner system?	_____	_____	_____	_____
3. Does the landfill have a functional leachate collection system?	_____	_____	_____	_____
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	_____	_____	_____	_____
(G) Special requirements for Containers (effective 11-19-81)				
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	_____	_____	_____	_____

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

*Not Inspected

Yes No NI* Remarks

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____
2. _____
3. _____
4. _____
5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

- Are combustion/emission control instruments monitored at least every 15 minutes? _____
- Is steady state maintained or corrections attempted? _____
- Is stack plume observed at least hourly for normal color and opacity? _____
- Did any stack observations made by owner or operator show a plume different than normal?** _____
- If yes to D above, were corrections made to return emissions to normal appearance?** _____
- Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions? _____
- Are emergency shutdown controls and system alarms checked daily for proper operation? _____

*NI Inspected

**Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	_____	_____	_____	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	_____	_____	_____	_____

	Yes	No	NI*	Remarks
Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	_____	_____	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	_____	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

N/A *mem*

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Date when WASTE ACCUMULATION</i>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>IS USUALLY LOCATED ON THE</i> <i>DRUM.</i>
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	<input type="checkbox"/>	<input type="checkbox"/>	<i>NA</i>	
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	<input type="checkbox"/>	<input type="checkbox"/>	<i>NA</i>	
c. Do continuous feed systems have a waste-feed cutoff?	<input type="checkbox"/>	<input type="checkbox"/>	<i>NA</i>	
d. Are required daily and weekly inspections done?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>These will be, this is the first year.</i>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?

☐ ☐ ☐ _____

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:
 - a. Notified the Administrator in writing?
 - b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?
 - c. Met the Manifest requirements?
2. Importing Hazardous Waste, has the generator:
 - Met the manifest requirements?

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	-	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	✓				

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?	_	_	_	
B. Are signed completed manifest(s) on file?	_	_	_	

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?	_	✓	_	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	_	✓	_	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

**D. Corrective
Action**

LAND AND CHEMICALS DIVISION

Type of Document: NFA - CA 550

Name of Document: SANCAP (LEXINGTON) ABRASIVES

	<u>NAMES</u>	<u>DATE</u>
AUTHOR:	<u>B. P. Freeman</u>	<u>8/4/14</u>
APA:		
SECTION CHIEF:	<u>Don Heller (signed)</u>	<u>8/8/14</u>
BRANCH CHIEF:	<u>→ Mike Burke for</u>	<u>9/1/14</u>
DIVISION APA:		
DIVISION DIRECTOR:		
OTHERS:	<u>ORC</u>	<u>See ORC</u>
	<u>EATON WEILER</u>	
	<u>MONTY CHARRIA</u>	<u>Concurrence Sheet</u>
DRA:		
RA:		

RETURN TO:

B. FREEMAN

PHONE:

7-2720

COMMENTS:

REGION 5 CONCURRENCE SHEET (ORC)

SUBJECT: LEXINGTON/SANCAP ABRASIVES RCRA NFA DETERMINATION

SF Site Charging "Account String." (SF Account String): 20[11] T 05D 302EC7C _____

Fill in blanks with the 4 digit Superfund Site ID # + the 2 letter action Code and the 2 digit OU code, if applicable

CONTROL NO. (if applicable): _____

Originator () _____ Date _____

Section Chief () _____ Date _____

Branch Chief : please check statute

COHEN ☐CAA

KYTE ☐CERCLA, ☐CAA112(r), ☐CWA311

LUPTON ☐CWA, ☐SDWA, ☐GLLA

NELSON ☐RCRA, ☐TSCA, ☐FIFRA, ☐EPCRA-313] _____ Date _____

Deputy Regional Counsel (Frey) _____ Date _____

Regional Counsel (Kaplan) _____ Date _____

(Please indicate name of appropriate Division(s) where concurrent signoff is required.)

NAME OF DIVISION LCD (see attached concurrence sheet of end of document)

Assigned Staff Person () _____ Date _____

Division Director () _____ Date _____

Other () _____ Date _____

NAME OF DIVISION ORC (see attached concurrence sheet of end of document)

Assigned Staff Person () _____ Date _____

Division Director () _____ Date _____

Other () _____ Date _____

OFFICE OF THE REGIONAL ADMINISTRATOR

Deputy Regional Administrator (Mathur) _____ Date _____

Regional Administrator (Hedman) _____ Date _____

Other (if applicable) () _____ Date _____

Other (if applicable) () _____ Date _____

A White House Executive Memorandum dated June 1, 1998, mandates that ".....The Federal Government's writing must be in plain language." This requirement became effective January 1, 1999. Originator and first level supervisor are responsible for assuring that documents are in plain language. All other reviewers should consider plain language in their reviews. (See plain language checklist of reverse side of this sheet.)

COMMENTS: _____

RETURN TO: _____

Plain Language Checklist

Write in the active voice. When you use the active voice, the subject of the sentence acts: "EPA issued the permit to X." When you use the passive voice, the subject of the sentence is acted upon: "The permit was issued to X." If you can ask "By whom?" or "By what?" after the verb, the verb is in the passive voice. A passive verb has a form of the verb "to be" (am, is, are, was, were, be, being, been) plus a main verb usually ending in "en" or "ed."

Use action verbs. Use base verbs instead of nouns derived from verbs.

Don't Say	Say	Don't Say	Say
is applicable to to	applies	make payment	pay
give consideration to	consider	take action	act

Use personal pronouns to represent the reader and to refer to EPA. For example, "The United States Environmental Protection Agency (EPA, we) is issuing an order to X (you, your). We are offering you..."

Write short sentences to aid comprehension. Put one main thought in most sentences. Divide a long sentence into two or three short sentences. Remove all unnecessary words. If there are several conditions or subordinate provisions, make a list.

Omit surplus words and redundancies. Question the need for each and every word.

Don't Say	Say	Redundancies
for the period of	for	true and correct
in order to	to	cease and desist
in the event that	if	order and direct

Place words carefully to reduce ambiguity. Keep subjects and objects close to verbs. Put modifying phrases and words such as "only" and "always" next to the word they modify.

She only said that he hired her. She said that only he hired her. She said that he hired only her.

Be consistent. Don't use different words to refer to the same thing (car, vehicle, automobile).

Limit your use of abbreviations and capital letters. Use abbreviations only to refer to terms that are central to the document. Do not abbreviate terms that you only use a few times. Use capital letters to begin sentences and proper names

**U.S. Environmental Protection Agency
Region 5**

**Determination of No Further Action
Lexington/SANCAP Abrasives Facility
16123 Armour Street
Alliance, OH
OHD 093 289 700**

Introduction

This document provides the United States Environmental Protection Agency's (EPA's) Determination of No Further Action (NFA) for the Lexington/SANCAP Abrasives facility ("Facility" or "Site"). The EPA is issuing this NFA Determination as part of its corrective action responsibilities under the Resource Conservation and Recovery Act (RCRA).

This document summarizes information that can be found in greater detail in the Site File for this Facility including these specific files from the EPA Region 5 Records Center:

- A.1. One Folder Site – SANCAP Abrasives

Determination

EPA has made a determination that no further action by the federal RCRA corrective action program is required at the Lexington/SANCAP Abrasives Facility at this time, based on the information contained in the Site File for this Facility.

EPA may modify this determination based on new information from any source. Therefore, this NFA Determination is being made available to the public. The public can be involved by reviewing this Determination the Administrative File for Facility.

A more detailed discussion of this NFA Determination is included below

Facility Background

Management

The Lexington/SANCAP Abrasives Company Facility is located at 16123 Armour Street, in a mixed-use industrial, agricultural and residential community in Alliance, Ohio. The Facility occupies a 280 acre parcel of land, located in Stark and Mahoning Counties. The primary building is a 625,000 sq. ft. and is occupied by three (3) separate companies; Lexington Abrasives, Inc. (d/b/a SANCAP Abrasives), SANCAP Liner Technology, Inc. (SANCAP Liner), and Quality Repair and Maintenance, Inc. (QRM). The facility layout is attached at end of this document. The Facility is bordered on the north by a wooded area and strip mines, and to the west, south and east by residences and farms. The nearest body of surface water is the Mahoning River which is located approximately 0.5 mi. west of the Facility, and is used for surface water runoff. Remsen soils are found in abundance at the site and contain 90-95% clay. These soils

could have acted as a natural liner for SANCAP's former settling lagoons.

Operations at the SANCAP facility began in the 1940s under the operation of Turner Aircraft. Turner manufactured light observation aircraft until filing for bankruptcy in 1948. In 1948, Armour Meat Packing bought the facility for upholstery and adhesive operations using glues from slaughtered animals. In 1970, Greyhound Bus Company bought the site. The current owners state that Greyhound bought and re sold the property within two weeks after acquiring it.

The property was subsequently bought by Armak Corporation, a subsidiary of Azko Chemical. Armak manufactured coated abrasives and liners in similar fashion to the current owners, of SANCAP. In 1978, Swiss Industrial Adhesive bought the site and operations remained the same. In 1988, Robert Stuhlmiller, purchased the coatings division of the company and named it SANCAP Liner. In 1992, Stuhlmiller also purchased the abrasives division and called it SANCAP Abrasives. SANCAP Abrasives manufactures coated sandpaper, while SANCAP Liner makes coated products including bottle cap liners. Another affiliated company called QRM is located between SANCAP Abrasives and SANCAP Liner. QRM performs maintenance on machinery at both facilities. Operations include changing oils, maintaining equipment, and some metal cutting. In March 1998, SANCAP Abrasives, Inc. became SANCAP Abrasives Corporation under the ownership of Edward Spinelli. In August 1, 1999, SANCAP Abrasives Corporation was reacquired by Robert Stuhlmiller and renamed Lexington Abrasives, Inc., but continued to do business as SANCAP Abrasives. QRM was owned by Tom Chiappini and Chuck Sefert when it began operation in 1992.

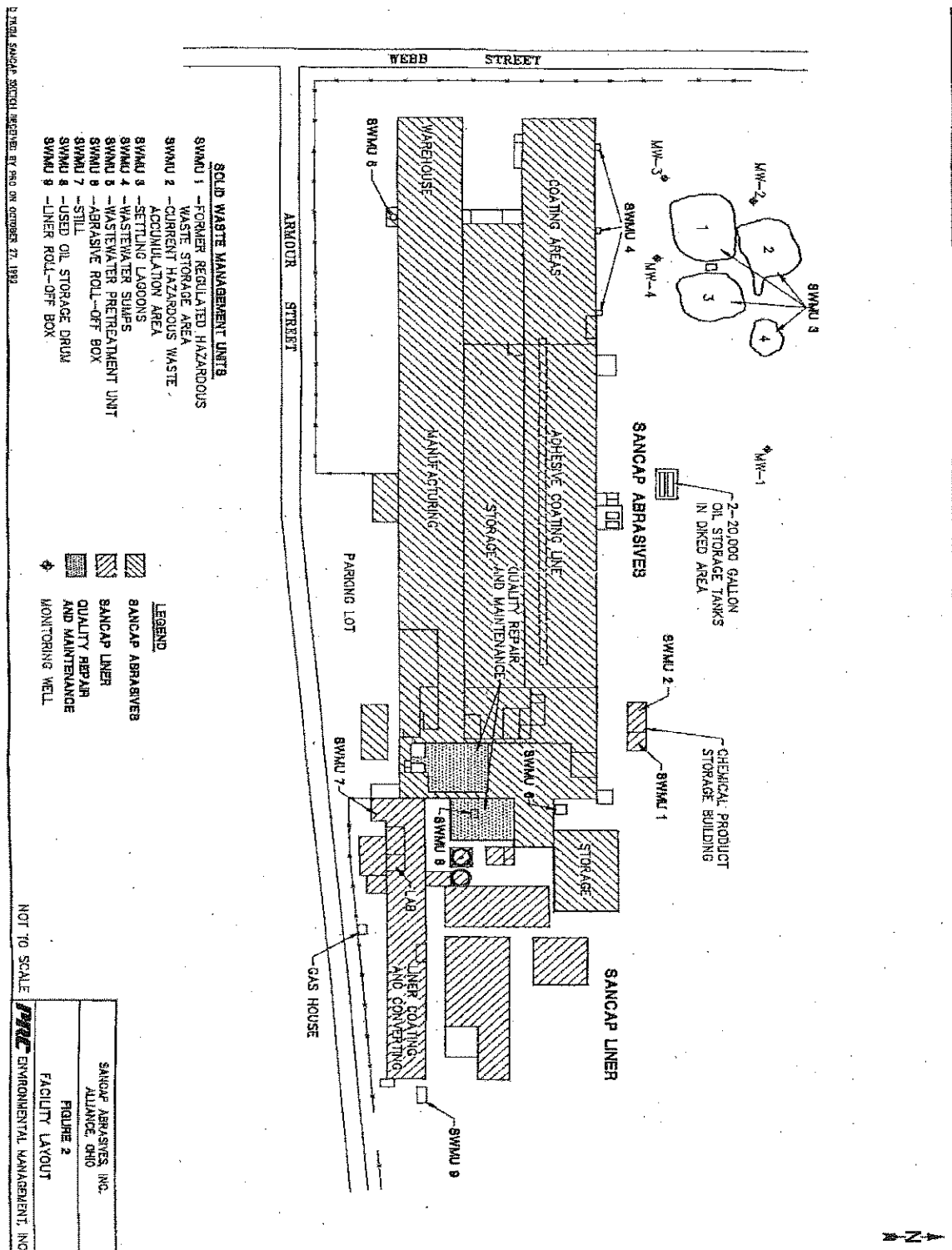
SANCAP Abrasives, located on the west side of the facility, manufactures several different coated abrasives, but primarily produces sandpaper. The abrasive coating process is initiated by applying adhesives and abrasive grains to the backing of either paper or cloth web. The coated web is then dried in an oven. After drying, the coated web is reduced to various sizes in converting operations to make disks and belts. Raw materials used in the manufacturing process include resins, animal glues, silica carbide grains, aluminum oxide grains, paper, and cloth.

SANCAP Liner, located on the east side of the facility, produces several different coated products, but primarily produces bottle cap liners. Operations at SANCAP Liner consist of receiving rolls of uncoated liners; placing the rolls on coating machines; and coating the rolls with adhesives, polyvinyl acetate, or paraffin. Excess material is trimmed from the coated rolls before they are printed and shipped to an off-site facility for stamping. Operations at SANCAP Liner are conducted under the supervision of, *inter alia*, the Food and Drug Administration because these operations involve food packaging.

QRM is located between SANCAP Abrasives and SANCAP Liner. QRM performs maintenance on machinery for both Facilities' Operations include changing oils, maintaining equipment, and some metal cutting.

A diagram of the entire Facility is shown in Figure 1, on the next page.

Figure 1 – SANCAP Lexington Facility Diagram



Waste Generation History

According to the 1992 Preliminary Assessment/Visual Site Inspection (PA/VSI), the facility generated the following wastes: waste methylene chloride (F002), methylene chloride still bottoms (F002), methyl ethyl ketone (MEK) (F005). During cleaning operations of the former solvent recycling still known as solid waste management unit (SWMU 7), methylene chloride still bottoms were generated, and very small quantities (ounces) of still bottoms were disposed in the liner roll-off box which was known as (SWMU 9).

SANCAP Abrasives also generates approximately 100 gallons of nonhazardous wastewater per day in process equipment and sumps at the abrasive coating machine. The wastewater is collected in the east and west wastewater sumps and gravity fed to the Central Wastewater Sump (SWMU 4). The wastewater is then pumped to the Wastewater Pretreatment Unit (SWMU 5) where the pH level of the wastewater is monitored. If necessary, the pH level is adjusted so the wastewater is within criteria set forth by the City of Alliance in the facility's wastewater discharge permit. The wastewater is then discharged to the sanitary sewer. Until 1978, the wastewater was pumped from the center sump to the Former Settling Lagoons (SWMU 3) before being discharged to the city sewer system. Nowadays after pH adjustment, (if required) the water is discharged directly to the sanitary sewer. The facility states that SANCAP and most if not all the residents are on the City of Alliance water system with waters coming from the Mahoning River, as well as local groundwater, subsequently treated and analyzed, and distributed to the residents and companies there.

Abrasive and liner trim wastes are generated by the converting operations at the SANCAP Abrasive and SANCAP Liner facilities. The abrasive trim is accumulated in the Abrasive Roll-off Box (SWMU 6), and liner trim is accumulated in the Liner Roll-off Box (SWMU 9). The roll-off boxes are emptied twice per week for disposal at the G & G Landfill in Carrollton, Ohio; the American Landfill in Malvern, Ohio; and/or the Kimbell Landfill in Dover, Ohio.

Until 1986, SANCAP Liner also generated MEK-containing hazardous waste (F005) from cleaning equipment. This waste was accumulated in 55-gallon drums at the Former Regulated Hazardous Waste Storage Area (SWMU 1). After this storage area was clean closed in November 1983, the MEK waste (F005) was accumulated at the Current Hazardous Waste Accumulation Area (SWMU 2)

QRM generates used oil during various equipment maintenance activities at the SANCAP facilities. The used oil is accumulated in a 55-gallon steel drum in the Used Oil Storage Drum (SWMU 8). The waste is then transported by Safety-Kleen Corporation (Safety-Kleen) to their facility in Cleveland, Ohio. QRM generates 100-150 gallons of waste oil annually.

SANCAP Abrasives submitted a Notification of Hazardous Waste Activity Form to EPA on August 13, 1980. In this notification, the facility indicated that it was a RCRA hazardous waste generator and storage facility. SANCAP Abrasives submitted a RCRA Part A permit application on November 18, 1980. This application indicated that hazardous wastes were stored in containers with a cumulative 5,500-gallon capacity in the Former Regulated Hazardous Waste Storage Area (SWMU 1). The facility also indicated that approximately 10,000 pounds of F005

waste and 1,000 pounds of ignitable wastes (D001) were generated at the site per year. In addition, the facility indicated that U002, UI59, U220, UI12, UI25, UI54, and U243 wastes could also be generated in the event of a spill, but annual quantities of such wastes were estimated at 0 pounds.

On June 25, 1982, SANCAP Abrasives requested withdrawal of the Part A permit application because they were not managing hazardous wastes on site for longer than 90 days. In October 1982, SANCAP Abrasives submitted a closure plan for the Former Regulated Hazardous Waste Storage Area (SWMU 1) to EPA. RCRA closure of this SWMU was completed in January 1983. EPA approved closure of the former storage area in February 1983 and approved withdrawal of the facility's Part A permit application in March 1983. Ohio EPA (OEPA) also approved withdrawal of the facility's Part A permit application on November 14, 1983, and the facility was classified as a RCRA generator only.

In 1992, SANCAP Abrasives and SANCAP Liner were operating as small quantity generators of hazardous waste under the original EPA identification number issued to SANCAP Abrasives (OHD 093289700). In the mid-1980s, SANCAP Liner reduced the quantity of hazardous waste it sent off site by recovering spent methylene chloride in a Solvent Still (SWMU 7). Since March 2001, Lexington Abrasives/DBA SANCAP Abrasives has been operating as a conditionally exempt small quantity generator (CESQG) under RCRA. SANCAP Liner currently has its own EPA ID number (OHD 987-022-498) and is also listed as a CESQG in the RCRA Info database.

In May 1991, SANCAP Abrasives submitted a Permit to Install application to OEPA for closure of the Former Settling Lagoons (SWMU 3). Final revisions to the Permit to Install application were submitted on April 22, 1992. On May 21, 1992, OEPA issued the facility a Permit to Install as approval to proceed with the closure of the former settling lagoons. Closure activities were conducted between April and October 1993, in accordance with OEPA regulations and the Permit to Install. SANCAP Abrasives provided OEPA with a Certification of Closure for the former settling lagoons in March 1994.

As part of the Permit to Install, the facility was required to conduct groundwater monitoring semi-annually over a three-year period at the four groundwater monitoring wells installed in 1988. As required, SANCAP Abrasives performed six semi-annual monitoring events starting in June 1993 and ending in December 1995. In June 1999, SANCAP requested OEPA's approval to decommission the four groundwater monitoring wells because they were no longer needed as monitoring points and had not been re-sampled since December 1995. On August 24, 1999, OEPA approved the request to decommission the four monitoring wells. On October 22, 1999, SANCAP Abrasives submitted Water Well Sealing Reports for these four wells.

The facility is also required to have operating air permits. SANCAP Abrasives has an air discharge permit for the 80-inch paper and cloth coating line. The facility also operated a 45-inch coating line under an air discharge permit. Prior to December 1998, SANCAP Abrasives and SANCAP Liner discharged noncontact cooling water, storm water, and boiler blowdown to an unnamed tributary of the Mahoning River by way of a roadside ditch under a National Pollutant Discharge Elimination System (NPDES) permit (number OH0063576). These

discharges were monitored for flow rate, pH, and oil and grease. In September 1998, SANCAP Abrasives requested that the liner operation discharge be removed from their permit because this division had been sold and was under new ownership. In November 1998, SANCAP Liner tied their wastewater discharge into the sanitary sewer system and therefore no longer required a NPDES permit. On October 27, 1999, a modified NPDES permit was issued to SANCAP Abrasives. This permit expired on November 30, 2004. The NPDES permit was not renewed in December 2004 because SANCAP Abrasives was also discharging all wastewaters to the City of Alliance wastewater treatment plant.

The SANCAP Abrasive facility discharges wastewater from the Wastewater Pretreatment Unit (SWMU 5) under City of Alliance Permit Number 216-A. Under this permit, the facility is required to monitor flow rate, pH, biological oxygen demand, chemical oxygen demand, total non-filterable solids, mercury, phenol, and zinc.

Hydrogeological Setting

Soils at the site are classified as Wadsworth silt loam and Remsen silt loam. The Wadsworth silt loam is typically a grayish-brown silt loam from a depth of 0 to 7 inches below ground surface (bgs); a brownish-yellow silty clay loam from 7 to 12 inches bgs; a brown, silty clay loam from 12 to 20 inches bgs; and a mottled-brown, clay loam fragipan from 20 to 31 inches bgs. Below the fragipan is a brown clay loam that extends to a depth of 48 inches bgs. This soil overlies a calcareous soil material that extends to 60 inches bgs. The Remsen silt loam is typically a dark grayish-brown silt loam from a depth of 0 to 7 inches bgs, and a mottled-brown, silty clay loam from 7 to 29 inches bgs. At approximately 36 inches bgs, there is a dark, yellow-brown layer approximately 10 inches thick that overlies a yellowish-brown silty clay glacial till. The depth to calcareous soil material ranges from 28 to 46 inches bgs.

Both the Wadsworth and Remsen soils typically contain high percentages of silt and clay with low permeabilities. The Wadsworth soils, which contain 70 to 90 percent silt and clay, have intervals with permeabilities as low as 0.063 to 0.2 inch per hour, or 0.5×10^{-3} to 17×10^{-3} centimeters per second (cm/sec). The Remsen soils, which typically contain 90 to 95 percent silt and clay, have intervals with permeabilities as low as 0.063 inch per hour, or 0.5×10^{-3} cm/sec. Because of their textural and permeability characteristics, these soils may have acted as a natural liner for the facility's Former Settling Lagoons.

Glacial till that was deposited during Wisconsinan glaciation underlies the Wadsworth and Remsen soil intervals in the site area. The shallowest glacial deposit in the area is the Hiram Till, which is a thin (*i.e.*, less than 2 feet thick) clay with very little sand or gravel. At the SANCAP Abrasive facility, the Lavery till may also be present beneath the Hiram Till. The thickness of till beneath the facility is unknown. Generally, till thickness increases dramatically toward the Mahoning River Valley, located west of the facility. The Pennsylvanian-age Pottsville Group consisting of coals, shales, sandstones, and thin limestones occurs beneath the glacial till. The bedrock surface dips gently to the southwest.

During closure of the Former Settling Lagoons, four groundwater monitoring wells were installed at the SANCAP Abrasives facility. All water-bearing zones except one were

encountered below the base of the clay-rich till. The exception is a small perched zone found at a depth of 16 to 18 feet below grade surface (bgs) in monitoring well 1. However, this zone yielded only very small amounts of water. The clay-rich till was encountered at a depth of 33 to 43 bgs. The intergranular permeability of the clay-rich till is expected to be on the order of 10^{-3} feet per day (103 cm/sec) or less. Permeability of the deeper, coarser-grained intervals encountered below the base of the clay till should be considerably higher than that of the till. Additionally, in Stark County, where till deposits contain thick, permeable layers of sand and gravel, high groundwater yields have been recorded. Water encountered in these coarser intervals is under confined pressure and typically rises 10 feet or more above the top of the water-bearing formation. Groundwater depths in the region typically vary from 22 to 25 feet bgs. Groundwater flow direction is generally to the southwest. The hydraulic gradient of the confined zones is approximately 0.01 foot per foot.

Groundwater in the site area through private wells is no longer used as a private drinking water supply. Most if not all of the City of Alliance, OH is on the cities' water supply system.

Ecological Setting

The SANCAP facility exists within a mixed-use, residential, industrial and agricultural area in Alliance, Ohio. The facility occupies a 280-acre parcel of land located in Stark and Mahoning Counties. The primary building at the facility is 625,000 square feet and is occupied by three separate businesses: SANCAP Abrasives, SANCAP Liner, and Quality Repair and Maintenance (QRM). The facility layout is provided in Appendix 1 to this document. The facility is bordered on the north by a wooded area and strip mines, and on the west, south, and east by residences, farms and other industries. The nearest body of surface water is the Mahoning River which is located 0.5 mile west of the facility and is used for surface runoff.

Vegetation in and around the SANCAP facility consists of primarily coarse native grasses that cover most of the undeveloped land. Stream banks, gullies and the banks of the Mahoning River often contain sumac and tall weeds.

No endangered species are known or observed to inhabit the local area. The Mahoning River and its tributaries is home to over many species of fish including Crappie, Bluegill and various Bass.

RCRA Status and Operation of SWMUs

SANCAP Abrasives submitted a Notification of Hazardous Waste Activity Form to EPA on August 13, 1980. In this notification, the facility indicated that it was a RCRA hazardous waste generator and storage facility. SANCAP Abrasives submitted a RCRA Part A permit application on November 18, 1980. This application indicated that hazardous wastes were stored in containers with a cumulative 5,500-gallon capacity in the Former Regulated Hazardous Waste Storage Area (SWMU 1). The facility also indicated that approximately 10,000 pounds of F005 waste and 1,000 pounds of ignitable wastes (D001) were generated at the site per year. In addition, the facility indicated that U002, UI59, U220, UI12, UI25, UI54, and U243 wastes could also be generated in the event of a spill, but annual quantities of such wastes were estimated at 0

pounds.

On June 25, 1982, SANCAP Abrasives requested withdrawal of the Part A permit application because they were not managing hazardous wastes on site for longer than 90 days). In October 1982, SANCAP Abrasives submitted a closure plan for the Former Regulated Hazardous Waste Storage Area (SWMU 1) to EPA. RCRA closure of this unit was completed in January 1983. EPA approved closure of the former storage area in February 1983 and approved withdrawal of the facility's Part A permit application in March 1983. Ohio EPA (OEPA) also approved withdrawal of the facility's Part A permit application on November 14, 1983, and the facility was classified as a RCRA generator only.

In 1992, SANCAP Abrasives and SANCAP Liner were operating as small quantity generators of hazardous waste under the original EPA identification number issued to SANCAP Abrasives (OHD 093289700). In the mid-1980s, SANCAP reduced the quantity of hazardous waste it sent off site by recovering spent methylene chloride in a Solvent Still (SWMU 7). Since this time, SANCAP has completely discontinued use of the solvent still and removed it from operation, as the lines were converted to using non hazardous solutions in place of the ones recovered in the still. Additionally, since March 2001, Lexington Abrasives/DBA SANCAP Abrasives has been operating as a conditionally exempt small quantity generator (CESQG) under RCRA. SANCAP Liner currently has its own EPA ID number (OHD 987022498) and is also listed as a CESQG in the RCRA Info database.

In May 1991, SANCAP Abrasives submitted a Permit to Install application to OEPA for closure of the Former Settling Lagoons (SWMU 3). Final revisions to the Permit to Install application were submitted on April 22, 1992. On May 21, 1992, OEPA issued the facility a Permit to Install as approval to proceed with the closure of the former settling lagoons. Closure activities were conducted between April and October 1993, in accordance with OEPA regulations and the Permit to Install. SANCAP Abrasives provided OEPA with a Certification of Closure for the former settling lagoons in March 1994.

As part of the Permit to Install, the facility was required to conduct groundwater monitoring semi-annually over a three-year period at the four groundwater monitoring wells installed in 1988. As required, SANCAP Abrasives performed six semi-annual monitoring events starting in June 1993 and ending in December 1995. In June 1999, SANCAP requested OEPA's approval to decommission the four groundwater monitoring wells because they were no longer needed as monitoring points and had not been re-sampled since December 1995. On August 24, 1999, OEPA approved the request to decommission the four monitoring wells. On October 22, 1999, SANCAP Abrasives submitted Water Well Sealing Reports for these four decommissioned monitoring wells.

The facility is also required to have operating air permits. SANCAP Abrasives has an air discharge permit for the 80-inch paper and cloth coating line. The facility also operated a 45-inch coating line under an air discharge permit.

Prior to December 1998, SANCAP Abrasives and SANCAP Liner discharged noncontact cooling water, storm water, and boiler blowdown to an unnamed tributary of the Mahoning River

by way of a roadside ditch under a National Pollutant Discharge Elimination System (NPDES) permit (number OH0063576). These discharges were monitored for flow rate, pH, and oil and grease. In September 1998, SANCAP Abrasives requested that the liner operation discharge be removed from their permit because this division had been sold and was under new ownership. In November 1998, SANCAP Liner tied their wastewater discharge into the sanitary sewer system and therefore no longer required a NPDES permit. On October 27, 1999, a modified NPDES permit was issued to SANCAP Abrasives. This permit expired on November 30, 2004. The NPDES permit was not renewed in December 2004 because SANCAP Abrasives was also discharging all wastewaters to the City of Alliance wastewater treatment plant.

The SANCAP Abrasives facility discharges wastewater from the Wastewater Pretreatment Unit (SWMU 5) under City of Alliance Permit Number 216-A. Under this permit, the facility is required to monitor flow rate, pH, biological oxygen demand, chemical oxygen demand, total non-filterable solids, mercury, phenol, and zinc.

Regulatory History

OEPA conducted RCRA compliance evaluation inspections in 1981 and 1983. No violations were noted during the 1981 inspection. Violations noted during the April 1983 inspection included:

- No chemical and physical analyses of wastes on file
- No waste analysis plan on file
- The facility did not control entry
- No inspection schedule and inadequate inspection frequency
- Training deficiencies
- Inadequate posting near areas where ignitable wastes are handled and stored and at each entrance
- Contingency plan and operating record deficiencies
- Improper storage of hazardous waste.

Information gathered during the 1983 OEPA inspection indicated that the facility was treating resin wastes by allowing them to harden on site. However, a follow-up inspection by OEPA concluded that the facility was not treating the waste because the resin was self-hardening. Thus, this waste was not to be considered in determination of RCRA generator classification. SANCAP Abrasives had also substituted a water-based, non-ignitable solvent for the original toluene-based adhesive, further reducing the quantity of hazardous waste generated by the facility.

In October 1991, OEPA received notice of a leaking transformer at the center substation from a machine workshop employee. This transformer had been removed from a cemented area at the SANCAP Abrasives facility and placed on the ground a few days prior to the notice. The transformer had leaked onto the cement prior to being moved and continued to leak on the ground at the substation. During an OEPA inspection in April 1992, SANCAP Abrasives indicated that the transformer had been properly disposed.

Investigations

Environmental investigations at SANCAP Abrasives were initiated in 1987 and completed in 1995. According to the Preliminary assessment/visual site inspection (PA/VSI), a SANCAP Abrasive representative indicated that the facility was required to either close or line the Former Settling Lagoons (SWMU 3) in the early 1980s. In 1987, SANCAP Abrasives chose to close the lagoons, and hired a contractor to conduct environmental sampling. In 1988, four groundwater monitoring wells were installed in the vicinity of the former settling lagoons. Locations of these wells are shown in Figures 1 and 2 of this NFA Determination. Monitoring Well 1 was installed upgradient of the former settling lagoons to provide background concentrations, and the remaining three wells were installed downgradient of the lagoons. Groundwater samples from these wells were analyzed for priority pollutant compounds (excluding pesticides), contamination indicators, water quality indicators, metals, acetone, MEK, and total xylenes. Analytical results indicated exceedances of OEPA drinking water standards for total dissolved solids (TDS), sulfate, manganese, selenium, and lead.

Sampling and analysis conducted in 1988 indicated that Lagoons 1 and 2 exhibited the greatest impact from historic treatment operations. Both water and sediment in these lagoons had elevated concentrations of phenol, total organic carbon (TOC), and barium. The barium concentration in Lagoon 3 suggested that it may have also occasionally received wastewater. Hazardous waste characterization on sediments in the lagoons indicated that they were not ignitable, corrosive, or characteristically toxic. However, the sulfide concentration in one sediment sample collected from Lagoon 1 was 496 milligrams per liter (mg/L), or just slightly less than the limit of 500 mg/L for the RCRA reactivity characteristic. Downgradient groundwater sampling did not detect elevated concentrations of the constituents present in lagoon water and sediment. Based on this information, sediments present in Lagoons 1, 2, and 3 were classified as residual wastes, and the sediment in Lagoon 4, which was used to provide soil for berm construction and occasionally dilution water, was classified as naturally occurring.

In February 1990, SANCAP submitted a Sampling and Analysis Plan (SAP) for Lagoon #1 sediment to OEPA. At OEPA's request, the SAP was developed to evaluate whether the sediments in Lagoon #1 were characteristic hazardous waste and to assess the adequacy of proposed closure activities. Although the SAP was executed, the sampling results were not provided in the available file materials. In 1991, SANCAP Abrasives performed a treatability study to evaluate the use of cement kiln dust as a stabilizing agent for Lagoon #1 sediments in response to OEPA comments on the settling lagoon closure plan. The treatability study demonstrated that: (1) the Lagoon #1 sediments do not leach appreciable sulfate, and (2) a sediment to kiln dust ratio of 2:1 reduces the reactive sulfide concentrations and provides favorable compressive strength. In 1993, the lagoons underwent non-RCRA closure in accordance with a Permit to Install issued by OEPA. The lagoons were drained, lagoon sediments were stabilized with cement kiln dust, and the units were backfilled with berm material.

As required by the Permit to Install for closure of the former settling lagoons, SANCAP Abrasives conducted six semi-annual groundwater monitoring events starting in June 1993 and ending in December 1995. During each monitoring event, groundwater samples were collected

for all four monitoring wells and analyzed for dissolved metals, pH, specific conductance, oil and grease, TOC, total organic halogen, phenol, sulfate, nitrate, TDS, and acetone. According to the April 1996 groundwater monitoring report, a comparison of the semi-annual groundwater monitoring data with data collected in November 1988 (pre-closure) indicated that changes in groundwater quality following closure were not significant. Concentrations of TOC and acetone showed decreasing trends since the initial sampling event in November 1988. Arsenic and manganese concentrations, which had increased slightly following closure, had returned to pre-closure levels by December 1995. Selenium, silver, and thallium were not detected in any downgradient well during any of the six post-closure sampling events. Barium was only detected in the December 1995 event at a concentration of 0.01 mg/L. TDS and sulfate concentrations increased from 4,500 mg/L to 5,160 mg/L and 3,100 mg/L to 3,340 mg/L, respectively, since the initial monitoring event in November 1988. Lead concentrations decreased from 0.1 mg/L in the pre-closure sampling to non-detect in the June and December 1995 events. Because groundwater data collected over the three-year period of post-closure monitoring did not indicate significant degradation of groundwater quality, SANCAP Abrasives recommended that no further groundwater monitoring be conducted at the closed lagoon site. SANCAP Abrasives also recommended that the four existing monitoring wells (MW-1 through MW-4) be decommissioned in accordance with OEPA regulations. Following receipt of an approval letter from OEPA in August 1999, the facility decommissioned the four monitoring wells in September 1999, and submitted Water Well Sealing Reports to OEPA in October 1999.

Corrective Action History

A total of nine SWMUs were identified through the PA/VSI process. Each of these areas is discussed below. The locations of the SWMUs were provided as Figure 2 of the PA/VSI Report, which is included as Appendix A to this document. No formal areas of concern (AOCs) were identified in the PA/VSI report.

SWMU 1 – Former Regulated Hazardous Waste Storage Area

Description and Release History

The Former Regulated Hazardous Waste Storage Area consists of a 60-foot by 50-foot area in the eastern part of the Chemical Product Storage Building that was formerly used for storage of hazardous and nonhazardous wastes in 55-gallon drums. Specifically, MEK-containing hazardous waste was managed in this unit for periods longer than 90 days between 1980 and 1983. This unit is located on a concrete floor with no drains. At the time of the VSI, this unit was being used for management of approximately 120 drums of hardened resin in open 55-gallon steel drums. According to the PA/VSI, this hardened resin had been left by SIA before the facility was sold to Robert Stuhlmueller in 1992. No signs of spills, leaks or solvent odor were noted at the time of the PA/VSI.

In April 1981, SANCAP Abrasives submitted a closure plan for this unit, and RCRA closure was completed in January 1983. Closure was accomplished through removal of hazardous wastes and decontamination of the area. No sampling was conducted as part of the RCRA closure

activities. Nevertheless, EPA and OEPA approved RCRA clean closure of this unit in 1983. No releases from this unit have been documented

Release Control, Response Actions, and Environmental Data

It was resolved through OEPA that the hardened resin waste drums generated in this SWMU could be disposed as solid non-hazardous waste. Thus, No further action was recommended for this SWMU in the PA/VSI.

SWMU 2 – Current Hazardous Waste Accumulation Area

Description and Release History

The facility's Current Hazardous Waste Accumulation Area consists of a 10-foot by 10-foot area in the western portion of the Chemical Product Storage Building. This indoor area was previously used to accumulate 55-gallon drums of spent MEK (F005) for less than 90 days. The unit is equipped with a concrete floor and a ventilation system to prevent the buildup of flammable vapors. The unit began operation in January 1983 and became inactive in 1985 or 1986, when SANCAP Liner stopped using MEK to clean equipment and SANCAP Abrasives and SANCAP Liner began recycling all their waste on site. No releases from this unit have been documented.

Release Control, Response Actions, and Environmental Data

No further action was recommended for this SWMU in the PA/VSI.

SWMU 3 – Former Settling Lagoons

Description and Release History

The Former Settling Lagoons were in operation from 1977 to 1987. Each of the four lagoons was unlined and used for management of wastewater generated during cleaning of the abrasive coating line. Lagoons 1 through 3 were excavated into native soil by SIA. Lagoon 4 was a borrow pit formed by excavation of berm material. Lagoon 1 was approximately 140 feet wide by 130 feet long by 4 feet deep. Lagoon 2 was approximately 170 feet wide by 120 feet long by 4 feet deep. Lagoon 3 was approximately 140 feet square by 3 feet deep. Lagoon 4 was approximately 120 feet square by 3 feet deep. Lagoons 1 and 2 were used for treatment of nonhazardous wastewater generated from equipment cleaning operations. Lagoon 1 was used for aeration of the wastewater, while Lagoon 2 served as a subsequent settling basin and discharge point. Rainwater collected in Lagoon 3 was also discharged into Lagoon 2. The combined wastewaters from Lagoon 2 were then discharged to the City of Alliance sanitary sewer system. Lagoon 4 was used to provide soil for berm construction and occasionally dilution water. At the time of the VSI, this unit was undergoing non-RCRA closure under guidance from OEPA.

A release to on-site soils occurred from this unit. Sampling and analyses of lagoon sediment and

water conducted in 1988 indicated that Lagoons 1 and 2 exhibited the greatest impact. Both groundwater and sediment from these lagoons had elevated concentrations of phenol, TOC, and barium. Hazardous waste characterization of the sediments in the lagoons indicated that the sediments were not ignitable, corrosive, or characteristically toxic under RCRA. However, Lagoon 1 had elevated sulfide reactivity levels, which were reportedly attributed to natural, swamp-like conditions

Release Control, Response Actions, and Environmental Data

No release controls were located at this unlined unit. As a result, closure activities were initiated at this unit in April 1993, in accordance with OEPA regulations and the Permit to Install. Closure activities consisted of draining standing water from the lagoons, stabilizing lagoon sediments with cement kiln dust, and backfilling the lagoons with berm material. Closure of this unit was completed in October 1993, and SANCAP Abrasives submitted a Certification of Closure for the Former Settling Lagoons to OEPA in March 1994.

As required by the Permit to Install, SANCAP Abrasives performed six semi-annual groundwater monitoring events at this unit, starting in June 1993 and ending in December 1995. During each monitoring event, groundwater samples were collected and analyzed for dissolved metals, pH, specific conductance, oil and grease, TOC, total organic halogen, phenol, sulfate, nitrate, TDS, and acetone. TDS, manganese, and sulfate were detected above OEPA secondary drinking water standards in monitoring wells both upgradient and downgradient of the lagoons. A comparison of all collected groundwater data was presented in the April 1996 Groundwater Monitoring Report. The report stated that "changes in groundwater quality following closure have been relatively slight. The most significant changes since closure are decreases in thallium and acetone concentrations to non-detected levels. Based on the pre-closure and post-closure monitoring, the impact of the former impoundments on groundwater quality is not considered significant." The report recommended that no further groundwater monitoring be conducted at the closed lagoon site, and that the four existing groundwater monitoring wells be decommissioned in accordance with OEPA regulations. No further groundwater sampling was conducted, and the four groundwater monitoring wells were decommissioned with OEPA approval in 1999 and the unit was considered clean closed.

SWMU 4 – Wastewater Sumps

Description and Release History

This unit consists of three outdoor, underground, lined, concrete sumps: east, west, and central. The west sump is 15 feet long by 10 feet wide by 5.5 feet deep. The central sump is 12 feet long by 10 feet wide by 6 feet deep. The east sump is 15 feet long by 10 feet wide by 6.5 feet deep. The sumps were used between 1977 and 1988 for management of wastewater from cleaning of the abrasive coating line. Wastewater accumulating in the east and west sumps gravity drained to the central sump, and then was pumped to the Former Settling Lagoons (SWMU 3). From 1988 to the present, this wastewater has instead been discharged to the Wastewater Pretreatment Unit (SWMU 5). No releases from SWMU 4 have been documented, and no visible signs or

evidence of a release were present during the VSI.

Release Control, Response Actions, and Environmental Data

According to the PA/VSI, the sumps are lined with an impervious liner and covered to prevent releases to the air. No further action was recommended for this SWMU in the PA/VSI.

SWMU 5 – Wastewater Pretreatment Unit

Description and Release History

This unit manages wastewater from abrasive coating line cleaning. This unit consists of a 1,500-gallon aboveground fiberglass tank located indoors above a concrete floor. Wastewater from the Center Sump (SWMU 4) is pumped to this unit, where the pH is adjusted, if necessary, to meet the facility's allowable discharge pH range of 6-10. SANCAP Abrasives discharges wastewater from this unit to the sanitary sewer system under City of Alliance Permit Number 216-A. The unit began operation prior to 1988 and was active at the time of the PA/VSI. No releases from this unit have been documented and no visible signs or evidence of a release were observed in the area during the PA/VSI.

Release Control, Response Actions, and Environmental Data

Because the tank is located aboveground, leaks would be easily and promptly detected. The tank is located in a dedicated concrete room with a concrete floor to contain potential leaks until they can be properly cleaned up. No further action was recommended for this SWMU in the PA/VSI.

SWMU 6 – Abrasive Roll-Off Box

Description and Release History

This unit consists of a 40-cubic yard steel roll-off box that manages trash and waste trim from SANCAP Abrasives operations. The abrasive waste is inert, nonhazardous, and non-liquid. The roll-off box is located outdoors on a concrete pad. The roll-off box is emptied twice per week, with waste being landfilled at one of three Ohio landfills. This unit began operations around 1985 and was active at the time of the PA/VSI. During the VSI, no visible signs or evidence of a release were noted in the area of this unit.

Release Control, Response Actions, and Environmental Data

No further action was recommended for this SWMU in the PA/VSI

SWMU 7 – Solvent Still

Description and Release History

The Solvent Still is used to recover spent methylene chloride (F002) from machine cleaning

activities. The still is located indoors on a concrete floor and is approximately 2 feet by 2 feet by 3.5 feet in size. Waste solvents are managed in 15-gallon quantities. Methylene chloride still bottoms (F002) are generated during annual Solvent Still cleaning operations. At the time of the VSI, the facility was disposing of still bottoms from this unit by putting them in the Liner Roll-off Box (SWMU 9). This unit was placed into service around 1985 or 1986 and was active at the time of the PA/VSI. During the VSI, no visible signs or evidence of a release or drains were noted in the area of this unit. Furthermore, no releases from this unit have been documented.

Release Control, Response Actions, and Environmental Data

The PA/VSI recommended that the facility manage and accumulate the waste methylene chloride still bottoms (F002) from this unit as a hazardous waste.

The process lines which formerly used hazardous solvents were converted to using non-hazardous liquids for the process, and the still was dismantled and removed and disposed of appropriately. Since no releases had ever been documented and the still ran in an area with a concrete floor, this unit was considered closed.

SWMU 8 – Used Oil Storage Drum

Description and Release History

This unit consists of a 55-gallon steel drum that is used to accumulate used oil from equipment maintained by QRM. When a sufficient volume of used oil has been collected, the waste oil is transported to the Safety-Kleen facility in Cleveland, Ohio for recycling. The drum is located on a concrete floor inside QRM's section of the primary facility building. This unit was placed into service in February 1992 and was still active at the time of the PA/VSI. No releases from this unit have been documented, and no visible signs or evidence of a release were present during the VSI.

Release Control, Response Actions, and Environmental Data

This unit is located indoors on a concrete floor. At the time of the PA/VSI, the drum was equipped with a covered funnel, and was kept closed unless waste oil was being added. No further action was recommended for this SWMU in the PA/VSI.

SWMU 9 – Liner Roll-Off Box

Description and Release History

This 40-cubic yard roll-off box is used for management of liner waste trim from SANCAP Liner. The waste trim is inert, nonhazardous, and non-liquid. The Liner Roll-off Box is emptied twice per week, and its contents are transported by Max Disposal to one of three Ohio landfills. This unit was placed into service around 1985 and was active at the time of the PA/VSI. In addition to trim wastes, this unit has reportedly received hazardous wastes. When the Solvent Still (SWMU 7) was cleaned (about once a year), the methylene chloride still bottoms (F002) were

thrown into the Liner Roll-off Box for disposal. However, no release has been documented from this unit, and no visible signs or evidence of a release were present during the VSI. SANCAP now uses non hazardous liquids on their manufacturing lines, and hazardous waste is no longer generated. Hazardous wastes were drummed and sent to Safety-Kleen facility in Cleveland, Ohio for treatment.

Release Control, Response Actions, and Environmental Data

The Liner Roll-off Box is located outdoors on a concrete pad in a covered area. The PA/VSI recommended that the facility manage and dispose of the methylene chloride still bottoms F002) as a hazardous waste.

All but SMWU 3 (wastewater treatment lagoons) and SWMU 9 (Liner Roll-Off Box existing on a concrete pad) were considered non-hazardous, and required no further action. Contaminants of concern at SANCAP Abrasives were principally lead, barium, phenol, reactive sulfides and to a lesser extent organic solvents such as methyl ethyl ketone (MEK), and acetone, used in the early development of resins in SANCAP's manufacturing processes, and for parts cleaning. The vast majority of these solvents (>99% as cited in the SANCAP 1992 Closure Plan) are reclaimed and recycled into facility operations. These operations took place on a concrete floor, with no known access to soils below the floor. Prior inspections reports prepared by the Ohio EPA identified that spillage of these substances was rare, and when they occurred (cited in inspection reports as less than one spill per year), they were immediately cleaned. In manufacturing applications using organics, final products such as sandpaper and resins were allowed to air dry and solidify rendering non-hazardous wastes.

In May 1991, SANCAP submitted an application for a "Permit to Install" to OEPA for closure of the former settling lagoons. The wastewater treatment lagoons were clean closed in June 1993. This closure entailed excavation of several feet of soil and sediments. Excavated material were properly characterized and disposed in an appropriate landfill. Confirmation sampling of the excavated areas was performed, and the soils in lagoon basins were judged to meet OEPA human health risk standards. The lagoons were then backfilled with clean fill. Waste water was thereafter handled by the municipal water treatment system in Alliance OH. SWMU 9 (Liner Roll-off Box) and SANCAP's hazardous waste storage area (both of which were on concrete pads having no direct access to soils were clean closed in February 1983, cited in a letter from Basil Constantelos of U.S. EPA to Mr. R. Goeldi, Vice President of SANCAP Abrasives on Feb 8, 1983.

Post-closure care requirements required by OEPA were instituted requiring SANCAP to conduct semi-annual groundwater measurements on monitoring wells (MWs) installed from June 1993 until December 1995. This requirement was to ensure that site contaminants were not leaching into local groundwater supplies.

Four (4) monitoring wells (MWs) were originally installed in 1988 by SANCAP and these consisted of MW1 (an upgradient background well) and MWs 2, 3 and 4 (all down gradient wells). The post closure sampling required in SANCAP's lagoon closure plan is described in **Appendix 1** ("Groundwater Monitoring Report of the Former Wastewater Treatment Lagoons")

as prepared by RUST Environmental, contractor for SANCAP. Each well sampled was analyzed for RCRA metals, total organic carbon (TOC), total organic halides (TOX), phenols, sulfate and acetone. The OEPA reviewed and approved this report, and indicated that the groundwater did not exceed any OEPA allowable contaminant concentrations. This data led SANCAP to petition the OEPA to allow them to decommission and abandon these monitoring wells. This petition was approved, and all monitoring wells were decommissioned in August of 1999, as evidenced in a letter dated August 24, 1999 from William J. Zawiski, of OEPA to SANCAP accepting SANCAP's decommissioning plan.

Regarding earlier potential releases from SMWU 9, SANCAP had petitioned the US EPA in a letter dated June 25, 1982 from R. Goeldi (SANCAP Vice President) to Ms. Kathy Homer of US EPA Waste Management Division to withdraw their Part A Hazardous Waste Permit under Section 3005 of RCRA. On March 22, 1983, in a letter from Karl Klepitsch of the US EPA, SANCAP was notified that they no longer required the Part A permit. SANCAP currently stores no hazardous waste over 90 days; any and all wastes produced as a part of operations are either recycled or shipped under manifest to an appropriate hazardous waste treatment vendor.

Conclusion

Based upon the information presented in this document and in the Site File regarding releases and remedial actions performed at this Site to address those releases, EPA has determined that no further action by the federal RCRA corrective action program is necessary at this Site at this time. The site conditions were assessed against the objectives for eliminating threats from a site named above and EPA believes that the management of the site has met those objectives. SANCAP clean closed their one principal treatment unit which would have been most likely to have releases to groundwater, which were a set of wastewater treatment lagoons (SWMU 3). The cleanup work for unit was completed in 1993, and the OEPA approved its closure later that year. Other units listed as SWMUs in the 1992 PA/VSI were dismantled and no longer existed at the time of my August, 2012 site visit. SANCAP successfully completed remediation of its principle wastewater treatment unit in 1993 employing Lancy Environmental and Wadsworth Alert Laboratory in 1993. SANCAP's Clean-Closure was approved by OEPA on July 12, 1994. As part of the clean closure and post closure care requirements, SANCAP was required to install and develop monitoring wells and test for potential impact of SANCAP operations on groundwater. SANCAP advanced the wells and monitored them on a semi-annual basis for three (3) years. No RCRA contaminants were detected above EPA MCLs. There are no other known waste management areas at the facility which had releases.

All former SWMUs and do not present concern for human health and the environment under the current conditions. EPA believes the site has achieved a CA070NO (no further investigation needed), CA400 (remedy decision), CA550-NR (remedy construction complete-no remedy) CA 900 NL (No Controls are Necessary)."

EPA reserves the right to change, modify or otherwise rescind this NFA Determination based on new information, from any source, not in the Site File at the time of this NFA Determination.

Appendix 1 – Groundwater Monitoring Report

**Ground Water Monitoring Report
Former Wastewater Treatment
Lagoon Site**

December 1993 Monitoring

Prepared for:

~~Sancap Abrasives~~
Alliance, Ohio
February 1994

QUALITY

◆
INTEGRITY

◆
CREATIVITY

◆
RESPONSIVENESS

RUST ENVIRONMENT &
INFRASTRUCTURE

Appendix 1 – Continued

Ground Water Monitoring Activities
Associated with Lagoon Closure
Sancap Abrasives

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APPENDICES

- Appendix A Field Sampling Forms
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Appendix 1 – Continued

*Ground Water Monitoring Activities
Associated with Lagoon Closure
Sancap Abrasives*

1.0 INTRODUCTION

In May 1992, Sancap Abrasives received an Ohio EPA "Permit to Install" as approval to proceed with closure activities at the company's wastewater treatment lagoon site in Alliance, Ohio. Included in the permit are requirements for monitoring the site's four ground water monitoring wells semi-annually over a three year period. According to the permit, monitoring is to be conducted in June and December for the parameters specified in the permit.

This ground water monitoring report prepared by RUST Environment & Infrastructure (REI) describes sampling and analysis procedures and findings for the second semi-annual monitoring event conducted on December 3, 1993. Closure of the lagoons was completed in June, 1993. Site and regional geologic and hydrogeologic conditions have been described in the previously submitted Site Evaluation Report for Wastewater Treatment Lagoons Site (by Lancy Environmental Services dated March 1989). Therefore, a detailed description of these conditions will not be repeated in this report.

Appendix 1 – Continued

2.0 SAMPLING

REI subcontracted an experienced ground water sampling technician to collect ground water samples from the four on-site monitor wells (MW-1, 2, 3, and 4). Sampling activities were performed on December 3, 1993 in accordance with EPA-approved methods and consisted of the following:

- Measuring and recording ground water levels
- Purging ground water prior to sampling
- Measuring and recording field parameters (pH, specific conductance, and temperature)
- Sample collection utilizing disposable polyethylene bailers and field filtering samples, as necessary, for metals analysis
- Placing samples in appropriate containers and completing necessary chain-of-custody documentation.

The completed field sampling forms are included as Appendix A.

During the measurement of field specific conductance, a low reading (60 umhos/cm) of the fourth replicate measurement of MW-1 was recorded. The first, second, and third measurements were 1850, 2020 and 2000 umhos/cm, respectively. The low reading is attributed to a temporary equipment malfunction. Replicate field measurements of the other three ground water samples were consistent.

As described in the previously submitted ground water monitoring report, during ground water sampling in June 1993 an obstruction was encountered in the MW-4 well casing which hampered sampling efforts. During sampling activities for December, 1993, the obstruction became dislodged enabling sampling in MW-4 to proceed as planned.

Appendix 1 – Continued

Ground Water Monitoring Activities
Associated with Lagoon Closure
Sancap Abrasives

3.0 ANALYSIS

Collected ground water samples and chain of custody documentation were transported to PACE Inc.'s laboratory in Warrendale, Pennsylvania. The ground water samples were analyzed for the parameters required by the Permit To Install. The following is a list of analytical parameters and methods:

Table 1
GROUND WATER ANALYTICAL
PARAMETERS AND METHODS

<u>Parameter</u>	<u>Method</u>
*pH	SW846 9040
*Specific Conductance	SW846 9050
Arsenic, Dissolved	SW846 6010
Barium, Dissolved	SW846 6010
Cadmium, Dissolved	SW846 6010
Chromium, Dissolved	SW846 6010
Lead, Dissolved	SW846 6010
Manganese, Dissolved	SW846 6010
Mercury, Dissolved	SW846 7470
Selenium, Dissolved	SW846 6010
Silver, Dissolved	SW846 6010
Thallium, Dissolved	SW846 6010
Zinc, Dissolved	SW846 6010
Oil & Grease	SW846 9070
Total Organic Carbon	SW846 9060
Total Organic Halogen	SW846 9020
Phenol	SW846 9066
Sulfate	SW846 9038
Nitrate	EPA 353.2
Total Dissolved Solids	EPA 160.1
Acetone	SW846 8240

* Field parameter

Analytical results are included as Appendix B.

Appendix 1 – Continued

4.0 FINDINGS

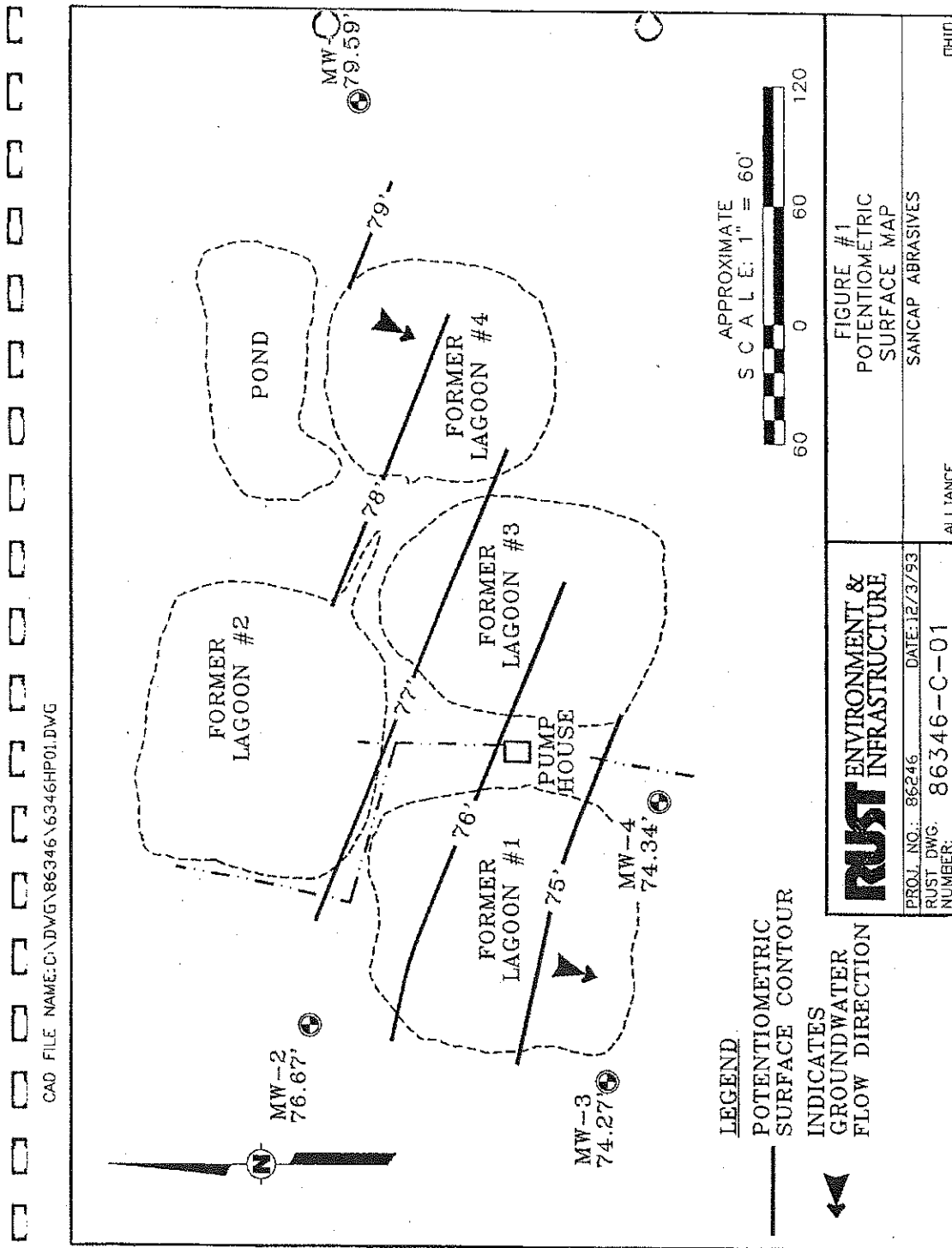
REI compared ground water monitoring data from the December 3, 1993 sampling event with ground water monitoring data from the November, 1988 (pre-closure) and June, 1993 events to identify possible trends in ground water quality and changes, if any, in ground water flow patterns. The potentiometric surface (ground water contour) map developed for the November 1988 sampling event indicates ground water flow direction from the northeast (MW-1) to the southwest (MW-3-MW-4). Figure 1 is a ground water contour and flow map developed from the relative datum and December 1993 ground water elevations. Ground water flow patterns (i.e. flow to the southwest) for the December 1993 event are consistent with historic patterns and site hydrogeologic interpretation. The calculated hydraulic gradient for the December 1993 measurement is approximately 0.01 ft./ft.

Table 3 compares the results in the downgradient wells from the three sampling events conducted at Sancap to date. Maximum network concentrations of TDS, phenols, total organic carbon, total organic halides, lead, selenium, thallium and acetone concentrations have decreased since the initial event in November, 1988. The most significant decreases occurred in TOC, lead, selenium, thallium, and acetone maximum concentrations. TOC was initially detected at 13-17 mg/L but has ranged from 3-5 mg/L during 1993. Selenium ranged from 0.015 to 0.05 mg/L in 1988, but has not been detected during the last two events. Lead and thallium detected in the initial event have also decreased to non-detected during the last two events. Acetone has been detected only in MW-4, at 100 µg/L in November, 1988 and 36 µg/L in June, 1993. Acetone was not detected in MW-4 in December, 1993. Specific conductance maximum concentrations increased since the pre-closure event. Arsenic manganese, and zinc levels have increased slightly in comparison with the pre-closure event. Cadmium, mercury and silver have not been detected in any downgradient well during any of the three sampling events.

For most parameters, maximum network concentration changes between the two recent events were non-existent or minor. The most notable decreases were in pH, specific conductance, oil and grease, and acetone concentrations. A high pH reading of 12 was recorded for MW-4 in June, 1993, but decreased to 6.8 in December, 1993. (Perhaps this anomalously high pH reading in June, 1993 was related to the inability to collect a representative pH sample due to the former obstruction in MW-4.) The most notable increases were in nitrogen nitrate and zinc concentrations.

Table 4 identifies constituent concentrations in downgradient wells which exceed twice the background (MW-1) concentrations. (Two times background was arbitrarily selected for comparison purposes.) As indicated by Table 4, two ground water monitoring parameters, manganese, and sulfate exceeded upgradient concentrations in excess of two times background concentrations. Manganese concentration in the background well was 0.20 mg/L, compared with the manganese concentrations of 3.0, 1.7 and 0.64 mg/L in MW-2, MW-3, and MW-4, respectively. Sulfate concentration in MW-1 was 1500 mg/L compared to 3100, 2700 and 2300 in MW-2, MW-3, and MW-4, respectively.

Figure 2 - Diagram of Settling Lagoons



Appendix 1 – Continued

Ground Water Monitoring Activities
Associated with Lagoon Closure
Sancap Abrasives

Table 2

GROUND WATER ELEVATIONS
AUGUST 26, 1993

<i>Well ID</i>	<i>Relative Casing Elevation (ft)</i>	<i>Measured Depth to Water (ft)</i>	<i>Ground Water Elevation (ft)</i>
MW-1	104.53	23.95	80.58
MW-2	100.25	22.20	78.05
MW-3	95.42	20.11	75.31
MW-4	97.62	21.77	75.85

GROUND WATER ELEVATIONS
DECEMBER 3, 1993

<i>Well ID</i>	<i>Relative Casing Elevation (ft)</i>	<i>Measured Depth to Water (ft)</i>	<i>Ground Water Elevation (ft)</i>
MW-1	104.53	24.94	79.59
MW-2	100.25	23.58	76.67
MW-3	95.42	21.15	74.27
MW-4	97.62	23.28	74.34

Appendix 1 – Continued

Ground Water Monitoring Activities
Associated with Lagoon Closure
Sancap Abrasives

TABLE 3

RANGE IN CONCENTRATION (MG/L)
DOWNGRAIDENT WELLS (MW-2, 3, 4)
JUNE 1993 EVENT

Parameter	11/21/88	6/02/93	12/03/93
pH (S.U.)	6.5-8.6	6.8-12	6.7-7.1
Specific Conductance (umhos)	>1990	530-3390	2300-2890
Total Dissolved Solids	3000-4500	1800-4600	3800-4300
Oil and Grease	<2.0	<2.0-4.9	<2.0
Phenols	<0.002-0.017	0.010-0.018	<0.005-0.01
Sulfate	2300-3100	810-3100	2300-3100
Total Organic Carbon	13-17	3-4	4-5
Total Organic Halides	<0.01-0.03	<0.01-0.01	<0.01-0.01
Arsenic	<0.002	<0.01-0.022	<0.01-0.01
Barium	0.04-0.08	<0.2	<0.2
Cadmium	<0.004	<0.005	<0.005
Chromium	<0.006-0.007	<0.01-0.01	<0.01
Lead	<0.1-0.1	<0.003	<0.003
Manganese	<0.001-2.6	<0.01-2.69	0.64-3.0
Mercury	<0.0002	<0.0002	<0.0002
Nitrogen Nitrate	NA	0.02-0.05	0.06-0.12
Selenium	0.015-0.05	<0.005	<0.005
Silver	<0.01	<0.01	<0.01
Thallium	<0.3-43	<1	<1
Zinc	<0.05	<0.02	<0.02-0.06
Acetone (µg/L)	110	<10-36	<10

NA = Not Analyzed

Appendix 1 – Continued

Ground Water Monitoring Activities
Associated with Lagoon Closure
Suncap Abrasives

TABLE 4

COMPARISONS BETWEEN UPGRAIDENT
AND DOWNGRAIDENT CONCENTRATIONS
DECEMBER 1993 EVENT

<i>Parameter</i>	<i>Conc. MWI Upgradient</i>	<i>Conc. Range Downgradient</i>	<i>Conc. > 2 X Background</i>
pH	6.9	6.7-7.1	No
Specific Conductance (umhos)	2020	2300-2890	No
Total Dissolved Solids	3200	3800-4300	No
Oil and Grease	<2.0	<2.0	No
Phenols	0.006	<0.005-0.01	No
Total Organic Carbon	4	4-5	No
Total Organic Halide	0.01	<0.01-0.01	No
Arsenic	0.03	<0.01-0.01	No
Cadmium	<0.005	<0.005	No
Chromium	<0.01	<0.01	No
Lead	<0.003	<0.003	No
Manganese	0.20	0.64-3.0	Yes
Mercury	<0.0002	<0.0002	No
Selenium	<0.05	<0.005	No
Silver	<0.01	<0.01	No
Thallium	<1	<1	No
Zinc	0.13	<0.02-0.06	No
Barium	<0.2	<0.2	No
Nitrogen Nitrate	0.08	0.06-0.12	No
Sulfate	1500	2300-3100	Yes
Acetone (µg/L)	<10	<10	No

Concentrations in mg/L except when noted

Appendix 1 – Continued

Ground Water Monitoring Activities
Associated with Lagoon Closure
Sancap Abrasives

Semi-annual ground water monitoring will be continued in 1994 to assess the long-term impact of lagoon closure on ground water quality.

Concurrences

Name	Title	Signature	Date
Brian P. Freeman	Project Manager	/Brian P. Freeman/	8/4/14
Eaton Weiler	Regional Counsel	<i>Eaton F Weiler</i>	9/4/14 9/4/14
Donald Heller	Supervisor (Acting)	<i>DON HELLER SIGNED</i>	9/8/14
Jose Cisneros	Branch Chief	<i>Jose Cisneros</i>	9/11/14

w/ comments
see first page
and attached
ACCOMMODATED, BPF
9/11/14

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: SANCAP Abrasives (aka Lexington Abrasives)
Facility Address: 16123 Armour Street, Alliance, OH 44601
Facility EPA ID #: OHD 093 289 700

1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?

- ☒ If yes - check here and continue with #2 below.
☐ If no - re-evaluate existing data, or
☐ if data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

Page 2

2. Is groundwater known or reasonably suspected to be "contaminated"¹ above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

- ☐ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
- ☒ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."
- ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

The March 1993 preliminary assessment/visual site inspection conducted by PRC Environmental Management Inc.(PRC) identified nine (9) solid waste management units (SWMUs) at the SANCAP (aka Lexington) Abrasives facility. All but SMWU 3 (wastewater treatment lagoons) and SWMU 9 (Liner Roll-Off Box existing on a concrete pad) were considered non-hazardous, and required no further action. Contaminants of concern at SANCAP Abrasives were principally lead, barium, phenol, reactive sulfides and to a lesser extent organic solvents such as methyl ethyl ketone (MEK), and acetone, used in the early development of resins in SANCAP's manufacturing processes, and for parts cleaning. The vast majority of these solvents (>99% as cited in the SANCAP 1992 Closure Plan) are reclaimed and recycled into facility operations. These operations took place on a concrete floor, with no known access to soils below the floor. Prior inspections reports prepared by the Ohio EPA identified that spillage of these substances was rare, and when they occurred (cited in inspection reports as less than one spill per year), they were immediately cleaned. In manufacturing applications using organics, final products such as sandpaper and resins were allowed to air dry and solidify rendering non-hazardous wastes.

In May 1991, SANCAP submitted an application for a "Permit to Install" to OEPA for closure of the former settling lagoons. The wastewater treatment lagoons were clean closed in June 1993. This closure entailed excavation of several feet of soil and sediments. Excavated material were properly characterized and disposed in an appropriate landfill. Confirmation sampling of the excavated areas was performed, and the soils in lagoon basins were judged to meet OEPA human health risk standards. The lagoons were then backfilled with clean fill. Waste water was thereafter handled by the municipal water treatment system in Alliance OH. SWMU 9 (Liner Roll-off Box) and SANCAP's hazardous waste storage area (both of which were on concrete pads having no direct access to soils) were clean closed in February 1983, cited in a letter from Basil Constantelos of U.S. EPA to Mr. R. Goeldi, Vice President of SANCAP Abrasives on Feb 8, 1983.

Post-closure care requirements required by OEPA were instituted requiring SANCAP to conduct semi-annual groundwater measurements on monitoring wells (MWs) installed from June 1993 until December 1995. This requirement was to ensure that site contaminants were not leaching into local groundwater supplies.

Four (4) monitoring wells (MWs) were originally installed in 1988 by SANCAP and these consisted of MW1 (an upgradient background well) and MWs 2, 3 and 4 (all down gradient wells). The post closure sampling required in SANCAP's lagoon closure plan is described in Table 3 ("Groundwater Monitoring

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
Page 4

4. Does "contaminated" groundwater discharge into surface water bodies?

- ☐ If yes - continue after identifying potentially affected surface water bodies.
- ☐ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
- ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

5. Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

- ☐ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgment/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system
- ☐ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration³ of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations⁵ greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing

- ☐ If unknown - enter "IN" status code in #8

Rationale and Reference(s):

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

Page 3

Report of the Former Wastewater Treatment Lagoons") as prepared by RUST Environmental, contractor for SANCAP. Each well sampled was analyzed for RCRA metals, total organic carbon (TOC), total organic halides (TOX), phenols, sulfate and acetone. The OEPA reviewed and approved this report, and indicated that the groundwater did not exceed any OEPA allowable contaminant concentrations. This data led SANCAP to petition the OEPA to allow them to decommission and abandon these monitoring wells. This petition was approved, and all monitoring wells were decommissioned in August of 1999, as evidenced in a letter dated August 24, 1999 from William J. Zawiski, of OEPA to SANCAP accepting SANCAP's decommissioning plan.

Regarding earlier potential releases from SMWU 9, SANCAP had petitioned the US EPA in a letter dated June 25, 1982 from R. Goeldi (SANCAP Vice President) to Ms. Kathy Homer of US EPA Waste Management Division to withdraw their Part A Hazardous Waste Permit under Section 3005 of RCRA. On March 22, 1983, in a letter from Karl Klepitsch of the US EPA, SANCAP was notified that they no longer required the Part A permit. SANCAP currently stores no hazardous waste over 90 days; any and all wastes produced as a part of operations are either recycled or shipped under manifest to an appropriate hazardous waste treatment vendor.

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"² as defined by the monitoring locations designated at the time of this determination)?

- ☐ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"⁴).
- ☐ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"⁴) - skip to #8 and enter "NO" status code, after providing an explanation.
- ☐ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)
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6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented³)?

- ☐ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment⁴, appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination
- ☐ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems
- ☐ If unknown - skip to 8 and enter "IN" status code

Rationale and Reference(s):

Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)

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7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

☐ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination".

☐ If no - enter "NO" status code in #8

☐ If unknown - enter "IN" status code in #8

Rationale and Reference(s):

**Migration of Contaminated Groundwater Under Control
Environmental Indicator (EI) RCRIS code (CA750)**

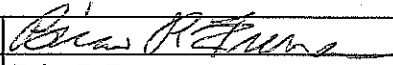
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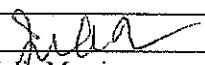
8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

☒ YES - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the SANCAP Abrasives (aka Lexington Abrasives) facility, at 16123 Armour Street, Alliance, OH 44601, OHD 093 289 700

☐ NO - Unacceptable migration of contaminated groundwater is observed or expected

☐ IN - More information is needed to make a determination

Completed by	(signature)		Date	6/20/12
	(print)	Brian P. Freeman		
	(title)	Chemist		

Supervisor	(signature)		Date	8/3/12
	(print)	Julie Morris		
	(title)	Acting Chief, RRB/CAS1		
	(EPA Region or State)	5		

Locations where References may be found:
7 th Floor RCRA Records Center, US EPA Region 5, 77 W. Jackson, Chicago, IL 60604

Contact telephone and e-mail numbers

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(phone #)	(312) 353-2720
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DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: SANCAP Abrasives (aka Lexington Abrasives)
Facility Address: 16123 Armour Street, Alliance, OH 44601
Facility EPA ID #: OHD 093 289 700

1. Has all available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

X If yes - check here and continue with #2 below.
____ If no - re-evaluate existing data, or
____ if data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

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2. Are groundwater, soil, surface water, sediments, or air media known or reasonably suspected to be “contaminated”¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater		X		
Air (indoors) ²		X		
Surface Soil (e.g., <2 ft)		X		
Surface Water		X		
Sediment		X		
Subsurf. Soil (e.g., >2ft)		X		
Air (indoors)		X		

X If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

—— If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

—— If unknown (for any media) - skip to #6 and enter “IN” status code.

Rationale and Reference(s):

The March 1993 preliminary assessment/visual site inspection conducted by PRC Environmental Management Inc.(PRC) identified nine (9) solid waste management units (SWMUs) at the SANCAP (aka Lexington) Abrasives facility. All but SMWU 3 (wastewater treatment lagoons) and SWMU 9 (Liner Roll-Off Box existing on a concrete pad) were considered non-hazardous, and required no further action. Contaminants of concern at SANCAP Abrasives were principally lead, barium, phenol, reactive sulfides and to a lesser extent organic solvents such as methyl ethyl ketone (MEK), and acetone, used in the early development of resins in SANCAP’s manufacturing processes, and for parts cleaning. The vast majority of these solvents (>99% as cited in the SANCAP 1982 Closure Plan) are reclaimed and recycled into facility operations. These operations took place on a concrete floor, with no known access to soils below the floor. Prior inspections reports prepared by the Ohio EPA identified that spillage of these substances was rare, and

¹ “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

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when they occurred (cited in inspection reports as less than one spill per year), they were immediately cleaned. In manufacturing applications using organics, final products such as sandpaper and resins were allowed to air dry and solidify rendering non-hazardous wastes.

The wastewater treatment lagoons were clean closed in June 1993, subsequent to excavation of several feet of soil and sediments, after a waste determination and disposal in an appropriate landfill, and confirmational sampling of the area under the lagoons was performed, and the soils in lagoon basins were judged to meet OEPA human health risk standards. The lagoons were then backfilled with clean fill. Waste water was thereafter handled by the municipal water treatment system in Alliance OH. SWMU 9 (Liner Roll-off Box) and SANCAP's hazardous waste storage area (both of which were on concrete pads having no direct access to soils) were clean closed in February 1983, cited in a letter from Basil Constantelos of U.S. EPA to Mr. R. Goeldi, Vice President of SANCAP Abrasives on Feb 8, 1983. Post-closure care requirements required by OEPA were instituted requiring SANCAP to conduct semi-annual groundwater measurements on wells installed by SANCAP in 1988 from June 1993 until December 1995. This requirement was to ensure that site contaminants were not leaching into local groundwater supplies. All monitoring wells were decommissioned in August of 1999, as evidenced in a letter from William J. Zawiski, OEPA to SANCAP accepting SANCAP's decommissioning plan.

SANCAP petitioned the US EPA in a letter dated June 25, 1982 from R. Goeldi (SANCAP Vice President) to Ms. Kathy Homer of US EPA Waste Management Division to withdraw their Part A Hazardous Waste Permit under Section 3005 of RCRA. On March 22, 1983, in a letter from Karl Klepitsch of US EPA, SANCAP was notified that they no longer required the Part A permit. SANCAP currently stores no hazardous waste over 90 days; any and all wastes produced as a part of operations are either recycled or shipped under manifest to an appropriate hazardous waste treatment vendor.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?
Summary Exposure Pathway Evaluation Table

Potential Human Receptors (Under Current Conditions)

"Contaminated" Media Residents Workers Day-Care Construction Trespassers Recreation Food³

Groundwater							
Air (indoors)							
Soil (surface, e.g., <2 ft)							
Surface Water							
Sediment							
Soil (subsurface e.g., >2 ft)							
Air (outdoors)							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

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2. Enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

_____ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

_____ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code.

Rationale and Reference(s):

4. Can the exposures from any of the complete pathways identified in #3 be reasonably expected to be "significant"⁴ (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

_____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

4

If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

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5. Can the "significant" exposures (identified in #4) be shown to be within acceptable limits?

NOT APPLICABLE

_____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

_____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):


6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

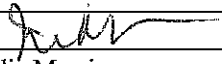
X

YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the SANCAP Abrasives facility, EPA ID # OHD 093 289 700, located at 16123 Armour Street, Alliance, OH 44601, under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

NO - "Current Human Exposures" are NOT "Under Control."

IN - More information is needed to make a determination.

Completed by	(signature)		Date	6/20/12
	(print)	Brian P. Freeman		
	(title)	Chemist and Project Manager		

Supervisor	(signature)		Date	8/3/12
	(print)	Julie Morris		
	(title)	Acting Chief, Corrective Action Section 1, RRB		
	(EPA Region or State)	5		

Locations where References may be found:

Region 5 records center (7th floor).

Records pertaining to SANCAP (Lexington) Abrasives OHD 093 289 700

Contact telephone and e-mail numbers

(name)	Brian P. Freeman
(phone #)	(312) 353-2720
(e-mail)	freeman.brian@epa.gov

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

SANCAP Abrasives, Inc.
16123 Armour St. N.E.
Alliance, OH 44601
(330) 821-3510

May 15, 2012

Brian Freeman
USEPA Region 5
LU9J
77 W. Jackson
Chicago, IL 60604

Dear Mr. Freeman,

Enclosed, please find the documentation that we discussed on the phone.

If you have any questions, please feel free to contact me.

Sincerely,



Robert Stuhlmiller
President

8 AM
JULY 17 (THES)
2012
Site Visit

Robert Stuhlmiller,
PRESIDENT
(330) 418 7443 (cell)
(330) 821 1166 (ofc) x 611

LEXINGTON (SMWU) ABRASIVES



Framework for our discussion on Lexington, steps in my plan of attack.

Brian Freeman to: Peter Ramanauskas

02/22/2012 04:29 PM

Cc: Brian Freeman

Peter,

As I reviewed in our meeting a couple weeks ago, there is really not a great deal going on RCRA CA wise at Lexington, but there are still a few considerations which I feel require addressing. The report we received from Booz-Allen (BAH) on Lexington was fairly complete in terms of SMWU descriptions, and their remote assessment of what may have gone on at Lexington based on file reviews. However, what the file says, and what is actually happening may be somewhat different. Based on what I read about this site, SMWUs 7, 8 and 9 are the ones which are the most likely origins of releases from this site.

Based on what I read, here is what I want BAH to do:

- 1) I want BAH to go out there and do some site reconnaissance.
- 2) Next, Booz should develop a sampling design to address my markup of the site map.
- 3) I have chosen four (4) hydropunch locations, which I will explain on the map when we meet. These are downgradient (south and west) of SMWUs having a release history. There are residential DW sources using groundwater in and around this facility. If contamination is found. I may ask for residential sampling at some point (or do it myself.)
- 4) I want surface to 6 inch soil samples taken around SMWUs 7, 8 and 9, in locations appearing to have stressed vegetation, staining, or other evidence of a release. In our meeting, I will list the contaminants I am suggesting to be run.
- 5) I wish for BAH to keep a keen eye toward potential RCRA waste handling violations, some of which BAH addressed in the summary report. If violations are noted, I will ask Lorna/Paul to send inspectors out there to inspect, and possibly take samples or review manifests, and review procedures, for possible violations.

Peter, we will talk more about this in our meeting tomorrow.

Brian P. Freeman
Chemist/Corrective Action Project Manager
Land and Chemicals Division, RRB/CAS1
U.S. EPA - Region 5
312.353.2720
freeman.brian@epa.gov

TABLE 3
RANGE IN CONCENTRATION (MG/L)
DOWNGRAIDENT WELLS (MW-2, 3, 4)
NOVEMBER 1988 THROUGH DECEMBER 1995 EVENTS

Parameter	11/21/88	6/02/93	12/03/93	6/01/94	12/02/94	6/06/95	12/05/95
pH (S.U.)	6.5-8.6	6.8-12	6.7-7.1	6.8-7.2	6.5-6.8	6.5-7.2	6.7-7.0
Spec. Conduc- tance (umhos)	>1990	530-3390	2300-2890	2200-2770	1440-3400	3360-4440	2370-2990
Total Dissolved Solids	3000-4500	1800-4600	3800-4300	3500-4800	3300-5100	3700-5100	3380-5160
Oil and Grease	<2.0	<2.0-4.9	<2.0	<2	<2	<2.0-4.0	<1
Phenols	<0.002-0.017	0.010-0.018	<0.005-0.01	0.01-0.011	<0.005- 0.015	<0.005-0.015	<0.005
Sulfate	2300-3100	810-3100	2300-3100	2400-3200	2200-3200	2400-3200	2470-3340
Total Organic Carbon	13-17	3-4	4-5	<1-3	2-3	1.3-1.9	1.6-1.9
Total Organic Halides	<0.01-0.03	<0.01-0.01	<0.01-0.01	<0.01- 0.04	<0.01	0.04-0.05	0.036-0.042
Arsenic	<0.002	<0.01-0.022	<0.01-0.01	<0.01	<0.01	<0.01-0.006	<0.005
Barium	0.04-0.08	<0.2	<0.2	<0.2	<0.2	<0.2	<0.01-0.01
Cadmium	<0.004	<0.005	<0.005	<0.005	<0.005	0.005-0.006	<0.01
Chromium	<0.006-0.007	<0.01-0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Lead	<0.1-0.1	<0.003	<0.003	<0.003- 0.008	<0.003- 0.003	<0.003	<0.1
Manganese	<0.001-2.6	<0.01-2.69	0.64-3.0	0.48-2.3	0.14-2.5	0.58-2.5	0.54-2.3
Mercury	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002- 0.0003
Nitrogen Nitrate	NA	0.02-0.05	0.06-0.12	0.03-0.07	0.02-0.08	0.04-0.25	0.02-0.05
Selenium	0.015-0.05	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Silver	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Thallium	<0.3-43	<1	<1	<1	<0.01	<0.01	<0.1
Zinc	<0.05	<0.02	<0.02-0.06	<0.02-2.8	0.02-0.38	<0.02-0.05	0.01-0.12
Acetone (µg/L)	110	<10-36	<10	<10	<10	<10	<10

NA = Not Analyzed

LETTER REPORT

SANCAP (LEXINGTON) ABRASIVES, INC. ALLIANCE, OHIO

December 9, 2011
REPA4-2531-015

Sancap (Lexington) Abrasives, Inc.

OHD 093 289 700

16123 Armour Street N.E.

Alliance, Ohio 46803

Stark and Mahoning Counties

40°56'45" N, 81°05'30" W

I. Background

Site Description, Geology, and Hydrogeology

The Sancap (Lexington) Abrasives, Inc. (Sancap Abrasives) facility is located at 16123 Armour Street in a mixed-use, residential, and agricultural area in Alliance, Ohio. The facility occupies a 280-acre parcel of land located in Stark and Mahoning Counties. The primary building at the facility is 625,000 square feet and is occupied by three separate businesses: Sancap Abrasives, Sancap Liner, and Quality Repair and Maintenance (QRM). The facility layout was provided as Figure 2 of the Preliminary Assessment/Visual Site Inspection (PA/VSI) Report (Ref. S-9), which is included as Attachment A to this Letter Report. The facility is bordered on the north by a wooded area and strip mines, and on the west, south, and east by residences and farms. The nearest body of surface water is the Mahoning River which is located 0.5 mile west of the facility and is used for surface runoff (Ref. S-11).

Soils at the site are classified as Wadsworth silt loam and Remsen silt loam. The Wadsworth silt loam is typically a grayish-brown silt loam from a depth of 0 to 7 inches below ground surface (bgs); a brownish-yellow silty clay loam from 7 to 12 inches bgs; a brown, silty clay loam from 12 to 20 inches bgs; and a mottled-brown, clay loam fragipan from 20 to 31 inches bgs. Below the fragipan is a brown clay loam that extends to a depth of 48 inches bgs. This soil overlies a calcareous soil material that extends to 60 inches bgs. The Remsen silt loam is typically a dark grayish-brown silt loam from a depth of 0 to 7 inches bgs, and a mottled-brown, silty clay loam from 7 to 29 inches bgs. At approximately 36 inches bgs, there is a dark, yellow-brown layer approximately 10 inches thick that overlies a yellowish-brown silty clay glacial till. The depth to calcareous soil material ranges from 28 to 46 inches bgs (Ref. S-11).

Both the Wadsworth and Remsen soils typically contain high percentages of silt and clay with low permeabilities. The Wadsworth soils, which contain 70 to 90 percent silt and clay, have intervals with permeabilities as low as 0.063 to 0.2 inch per hour, or 0.5×10^{-3} to 17×10^{-3}

centimeters per second (cm/sec). The Remsen soils, which typically contain 90 to 95 percent silt and clay, have intervals with permeabilities as low as 0.063 inch per hour, or 0.5×10^{-3} cm/sec. Because of their textural and permeability characteristics, these soils may have acted as a natural liner for the facility's Former Settling Lagoons (Ref. S-11).

Glacial till that was deposited during Wisconsinan glaciation underlies the Wadsworth and Remsen soil intervals in the site area. The shallowest glacial deposit in the area is the Hiram Till, which is a thin (i.e., less than 2 feet thick) clay with very little sand or gravel. At the Sancap Abrasive facility, the Lavery till may also be present beneath the Hiram Till. The thickness of till beneath the facility is unknown. Generally, till thickness increases dramatically toward the Mahoning River Valley, located west of the facility. The Pennsylvanian-age Pottsville Group consisting of coals, shales, sandstones, and thin limestones occurs beneath the glacial till. The bedrock surface dips gently to the southwest (Ref. S-11).

During closure of the Former Settling Lagoons, four groundwater monitoring wells were installed at the Sancap Abrasives facility. All water-bearing zones except one were encountered below the base of the clay-rich till. The exception is a small perched zone found at a depth of 16 to 18 feet bgs in monitoring well 1. However, this zone yielded only very small amounts of water. The clay-rich till was encountered at a depth of 33 to 43 bgs. The intergranular permeability of the clay-rich till is expected to be on the order of 10^{-3} feet per day (103 cm/sec) or less. Permeability of the deeper, coarser-grained intervals encountered below the base of the clay till should be considerably higher than that of the till. Additionally, in Stark County, where till deposits contain thick, permeable layers of sand and gravel, high groundwater yields have been recorded. Water encountered in these coarser intervals is under confined pressure and typically rises 10 feet or more above the top of the water-bearing formation. Groundwater depths in the region typically vary from 22 to 25 feet bgs. Groundwater flow direction is generally to the southwest. The hydraulic gradient of the confined zones is approximately 0.01 foot per foot (Ref. S-11).

Groundwater in the site area is used as a private drinking water supply. The nearest drinking water well is located 500 feet southwest of the facility (Ref. S-11).

Process and History

Operations at the Sancap Abrasives facility began in the 1940s under the ownership of Turner Aircraft (Turner). Turner manufactured light observation aircraft at the facility until filing for bankruptcy. In 1948, Armour Meat Packing (Armour) bought the facility for upholstery and adhesive operations using glues from slaughtered animals. In 1970, Greyhound Motor Coach bought the facility; no additional information on Greyhound operations was found in the available file material. Two weeks after acquiring the property, Greyhound sold it to Armak Corporation, a subsidiary of Azko. Armak manufactured coated abrasives and liners at the facility (Ref. S-11).

In 1978, Swiss Industrial Abrasive (SIA) purchased the facility and renamed it Sancap Abrasives, but facility operations remained the same. In 1986, SIA changed the facility's name to SIA America. In 1988, Robert Stuhlmiller purchased the liner coating division and named it

Sancap Liner. In 1992, Stuhlmiller also purchased the abrasive operations division and renamed it Sancap Abrasives, Inc. In March 1998, Sancap Abrasives, Inc. became Sancap Abrasives Corporation under the ownership of Edward Spinelli. In August 1, 1999, Sancap Abrasives Corporation was reacquired by Robert Stuhlmiller and renamed Lexington Abrasives, Inc., but continued to do business as Sancap Abrasives. QRM was owned by Tom Chiappini and Chuck Sefert when it began operation in 1992. Current ownership information regarding QRM is unknown (Refs. S-11, S-19, and S-21).

Sancap Abrasives, located on the west side of the facility, manufactures several different coated abrasives, but primarily produces sandpaper. The abrasive coating process is initiated by applying adhesives and abrasive grains to the backing of either paper or cloth web. The coated web is then dried in an oven. After drying, the coated web is reduced to various sizes in converting operations to make disks and belts. Raw materials used in the manufacturing process include resins, animal glues, silica carbide grains, aluminum oxide grains, paper, and cloth (Ref. S-11).

Sancap Liner, located on the east side of the facility, produces several different coated products, but primarily produces bottle cap liners. Operations at Sancap Liner consist of receiving rolls of uncoated liners; placing the rolls on coating machines; and coating the rolls with adhesives, polyvinyl acetate, or paraffin. Excess material is trimmed from the coated rolls before they are printed and shipped to an off-site facility for stamping. Operations at Sancap Liner are conducted under the supervision of the Food and Drug Administration because these operations involve food packaging (Ref. S-11).

QRM is located between Sancap Abrasives and Sancap Liner. QRM performs maintenance on machinery at both facilities. Operations include changing oils, maintaining equipment, and some metal cutting (Ref. S-11).

Resource Conservation and Recovery Act (RCRA) hazardous wastes currently generated at the facility are primarily related to equipment cleaning with methylene chloride (F002). Until 1985 or 1986, the facility also used methyl ethyl ketone (MEK) for equipment cleaning and generated MEK-containing hazardous waste (F005). In 1992, at the time of the PA/VSI, both Sancap Abrasives and Sancap Liner were classified as small quantity generators of RCRA hazardous waste (Ref. S-11).

Waste Streams

According to the 1992 PA/VSI, the facility generated the following hazardous and nonhazardous wastes: waste methylene chloride (F002); methylene chloride still bottoms (F002); nonhazardous wastewater; abrasive and liner trim; used oil; and hardened resin. Until 1985 or 1986, the facility also generated MEK waste (F005) from cleaning equipment (Ref. S-11).

Methylene chloride still bottoms (F002) are generated when the Solvent Still (solid waste management unit [SWMU] 7) is cleaned approximately once per year. During these annual cleaning operations, a "handful" of bottoms are thrown into the Liner Roll-off Box (SWMU 9). Specific details on waste volumes were not provided in the available file materials. This roll-off

container is emptied twice per week, with wastes transported by Max Disposal to a transfer facility in Alliance, Ohio. The waste is subsequently landfilled at the G & G Landfill in Carrollton, Ohio; the American Landfill in Malvern, Ohio; and/or the Kimbell Landfill in Dover, Ohio (Ref. S-11).

Sancap Abrasives generates nonhazardous hardened resin during the manufacture of coated abrasives. After the self-hardening resins are applied to cloth or paper, the excess resin is placed in 55-gallon drums at the former Regulated Hazardous Waste Storage Area (SWMU 1). The hardened resin is transported by Enviroco Transportation, Inc., to American Landfill, Inc., in Waynesburg, Ohio. Sancap Abrasives generates about 144,000 pounds of this waste annually (Ref. S-11).

Sancap Abrasives also generates approximately 100 gallons of nonhazardous wastewater per day in process equipment and sumps at the abrasive coating machine. The wastewater is collected in the east and west wastewater sumps and gravity fed to the Central Wastewater Sump (SWMU 4). The wastewater is then pumped to the Wastewater Pretreatment Unit (SWMU 5) where the pH level of the wastewater is monitored. If necessary, the pH level is adjusted so the wastewater is within criteria set forth by the City of Alliance in the facility's wastewater discharge permit. The wastewater is then discharged to the sanitary sewer. Until 1978, the wastewater was pumped from the center sump to the Former Settling Lagoons (SWMU 3) before being discharged to the city sewer system (Ref. S-11).

Abrasive and liner trim wastes are generated by the converting operations at the Sancap Abrasive and Sancap Liner facilities. The abrasive trim is accumulated in the Abrasive Roll-off Box (SWMU 6), and liner trim is accumulated in the Liner Roll-off Box (SWMU 9). The roll-off boxes are emptied twice per week for disposal at the G & G Landfill in Carrollton, Ohio; the American Landfill in Malvern, Ohio; and/or the Kimbell Landfill in Dover, Ohio (Ref. S-11).

Until 1985 or 1986, Sancap Liner also generated MEK-containing hazardous waste (F005) from cleaning equipment. This waste was accumulated in 55-gallon drums at the Former Regulated Hazardous Waste Storage Area (SWMU 1). After this storage area was closed in November 1983, the MEK waste (F005) was accumulated at the Current Hazardous Waste Accumulation Area (SWMU 2) (Ref. S-11).

QRM generates used oil during various equipment maintenance activities at the Sancap facilities. The used oil is accumulated in a 55-gallon steel drum in the Used Oil Storage Drum (SWMU 8). The waste is then transported by Safety-Kleen Corporation (Safety-Kleen) to their facility in Cleveland, Ohio. QRM generates 100-150 gallons of waste oil annually (Ref. S-11).

RCRA Status and Environmental Permits

Sancap Abrasives submitted a Notification of Hazardous Waste Activity Form to EPA on August 13, 1980 (Ref. S-11). In this notification, the facility indicated that it was a RCRA hazardous waste generator and storage facility. Sancap Abrasives submitted a RCRA Part A permit application on November 18, 1980. This application indicated that hazardous wastes were stored in containers with a cumulative 5,500-gallon capacity in the Former Regulated Hazardous Waste Storage Area (SWMU 1). The facility also indicated that approximately 10,000 pounds of F005

waste and 1,000 pounds of ignitable wastes (D001) were generated at the site per year. In addition, the facility indicated that U002, UI59, U220, UI12, UI25, UI54, and U243 wastes could also be generated in the event of a spill, but annual quantities of such wastes were estimated at 0 pounds (Refs. S-1 and S-2).

On June 25, 1982, Sancap Abrasives requested withdrawal of the Part A permit application because they were not managing hazardous wastes on site for longer than 90 days (Ref. S-3). In October 1982, Sancap Abrasives submitted a closure plan for the Former Regulated Hazardous Waste Storage Area (SWMU 1) to EPA. RCRA closure of this unit was completed in January 1983 (Refs. S-2 and S-4). EPA approved closure of the former storage area in February 1983 and approved withdrawal of the facility's Part A permit application in March 1983 (Refs. S-5 and S-6). Ohio EPA (OEPA) also approved withdrawal of the facility's Part A permit application on November 14, 1983, and the facility was classified as a RCRA generator only (Ref. S-11).

In 1992, Sancap Abrasives and Sancap Liner were operating as small quantity generators of hazardous waste under the original EPA identification number issued to Sancap Abrasives (OHD 093289700). In the mid-1980s, Sancap Liner reduced the quantity of hazardous waste it sent off site by recovering spent methylene chloride in a Solvent Still (SWMU 7) (Ref. S-11). Since March 2001, Lexington Abrasives/DBA Sancap Abrasives has been operating as a conditionally exempt small quantity generator (CESQG) under RCRA. Sancap Liner currently has its own EPA ID number (OHD 987022498) and is also listed as a CESQG in the RCRA Info database (Ref. S-23 and S-26).

In May 1991, Sancap Abrasives submitted a Permit to Install application to OEPA for closure of the Former Settling Lagoons (SWMU 3). Final revisions to the Permit to Install application were submitted on April 22, 1992. On May 21, 1992, OEPA issued the facility a Permit to Install as approval to proceed with the closure of the former settling lagoons. Closure activities were conducted between April and October 1993, in accordance with OEPA regulations and the Permit to Install. Sancap Abrasives provided OEPA with a Certification of Closure for the former settling lagoons in March 1994 (Refs. S-12 and S-13).

As part of the Permit to Install, the facility was required to conduct groundwater monitoring semi-annually over a three-year period at the four groundwater monitoring wells installed in 1988. As required, Sancap Abrasives performed six semi-annual monitoring events starting in June 1993 and ending in December 1995. In June 1999, Sancap requested OEPA's approval to decommission the four groundwater monitoring wells because they were no longer needed as monitoring points and had not been resampled since December 1995 (Ref. S-17). On August 24, 1999, OEPA approved the request to decommission the four monitoring wells (Ref. S-18). On October 22, 1999, Sancap Abrasives submitted Water Well Sealing Reports for these four wells (Ref. S-20).

The facility is also required to have operating air permits. Sancap Abrasives has an air discharge permit for the 80-inch paper and cloth coating line. The facility also operated a 45-inch coating line under an air discharge permit (Ref. S-11).

Prior to December 1998, Sancap Abrasives and Sancap Liner discharged noncontact cooling water, storm water, and boiler blowdown to an unnamed tributary of the Mahoning River by way of a roadside ditch under a National Pollutant Discharge Elimination System (NPDES) permit (number OH0063576). These discharges were monitored for flow rate, pH, and oil and grease. In September 1998, Sancap Abrasives requested that the liner operation discharge be removed from their permit because this division had been sold and was under new ownership (Ref. S-15). In November 1998, Sancap Liner tied their wastewater discharge into the sanitary sewer system and therefore no longer required a NPDES permit (Ref. S-16). On October 27, 1999, a modified NPDES permit was issued to Sancap Abrasives. This permit expired on November 30, 2004 (Ref. S-21). The NPDES permit was not renewed in December 2004 because Sancap Abrasives was also discharging all wastewaters to the City of Alliance wastewater treatment plant (Ref. S-25).

The Sancap Abrasive facility discharges wastewater from the Wastewater Pretreatment Unit (SWMU 5) under City of Alliance Permit Number 216-A. Under this permit, the facility is required to monitor flow rate, pH, biological oxygen demand, chemical oxygen demand, total nonfilterable solids, mercury, phenol, and zinc (Ref. S-11).

Compliance Inspections, Environmental Assessments, and Site Investigations

OEPA conducted RCRA compliance evaluation inspections in 1981 and 1983. No violations were noted during the 1981 inspection. Violations noted during the April 1983 inspection (Ref. S-11) included:

- No chemical and physical analyses of wastes on file
- No waste analysis plan on file
- The facility did not control entry
- No inspection schedule and inadequate inspection frequency
- Training deficiencies
- Inadequate posting near areas where ignitable wastes are handled and stored and at each entrance
- Contingency plan and operating record deficiencies
- Improper storage of hazardous waste.

Information gathered during the 1983 OEPA inspection indicated that the facility was treating resin wastes by allowing them to harden on site. However, a follow-up inspection by OEPA concluded that the facility was not treating the waste because the resin was self-hardening. Thus, this waste was not to be considered in determination of RCRA generator classification. Sancap Abrasives had also substituted a water-based, non-ignitable solvent for the original toluene-based adhesive, further reducing the quantity of hazardous waste generated by the facility (Ref. S-11).

In October 1991, OEPA received notice of a leaking transformer at the center substation from a machine workshop employee. This transformer had been removed from a cemented area at the Sancap Abrasives facility and placed on the ground a few days prior to the notice. The transformer had leaked onto the cement prior to being moved and continued to leak on the

ground at the substation. During an OEPA inspection in April 1992, Sancap Abrasives indicated that the transformer had been properly disposed (Ref. S-10).

Investigations

Environmental investigations at Sandcap Abrasives were initiated in 1987 and completed in 1995. According to the PA/VSI, a Sancap Abrasive representative indicated that the facility was required to either close or line the Former Settling Lagoons (SWMU 3) in the early 1980s. In 1987, Sancap Abrasives chose to close the lagoons, and hired a contractor to conduct environmental sampling. In 1988, four groundwater monitoring wells were installed in the vicinity of the former settling lagoons. Locations of these wells are shown in Figure 2 in Attachment A and Figure 1 in Attachment B to this Letter Report. Monitoring Well 1 was installed upgradient of the former settling lagoons to provide background concentrations, and the remaining three wells were installed downgradient of the lagoons. Groundwater samples from these wells were analyzed for priority pollutant compounds (excluding pesticides), contamination indicators, water quality indicators, metals, acetone, MEK, and total xylenes (Ref. S-9). Analytical results indicated exceedances of OEPA drinking water standards for total dissolved solids (TDS), sulfate, manganese, selenium, and lead (Ref. S-13).

Sampling and analysis conducted in 1988 indicated that Lagoons 1 and 2 exhibited the greatest impact from historic treatment operations. Both water and sediment in these lagoons had elevated concentrations of phenol, total organic carbon (TOC), and barium. The barium concentration in Lagoon 3 suggested that it may have also occasionally received wastewater. Hazardous waste characterization on sediments in the lagoons indicated that they were not ignitable, corrosive, or characteristically toxic. However, the sulfide concentration in one sediment sample collected from Lagoon 1 was 496 milligrams per liter (mg/L), or just slightly less than the limit of 500 mg/L for the RCRA reactivity characteristic. Downgradient groundwater sampling did not detect elevated concentrations of the constituents present in lagoon water and sediment. Based on this information, sediments present in Lagoons 1, 2, and 3 were classified as residual wastes, and the sediment in Lagoon 4, which was used to provide soil for berm construction and occasionally dilution water, was classified as naturally occurring (Refs. S-9 and S-11).

In February 1990, Sancap submitted a Sampling and Analysis Plan (SAP) for Lagoon #1 sediment to OEPA. At OEPA's request, the SAP was developed to evaluate whether the sediments in Lagoon #1 were characteristic hazardous waste and to assess the adequacy of proposed closure activities. Although the SAP was executed, the sampling results were not provided in the available file materials. In 1991, Sancap Abrasives performed a treatability study to evaluate the use of cement kiln dust as a stabilizing agent for Lagoon #1 sediments in response to OEPA comments on the settling lagoon closure plan. The treatability study demonstrated that: (1) the Lagoon #1 sediments do not leach appreciable sulfate, and (2) a sediment to kiln dust ratio of 2:1 reduces the reactive sulfide concentrations and provides favorable compressive strength. In 1993, the lagoons underwent non-RCRA closure in accordance with a Permit to Install issued by OEPA. The lagoons were drained, lagoon sediments were stabilized with cement kiln dust, and the units were backfilled with berm material (Refs. S-9, S-11, and S-13).

As required by the Permit to Install for closure of the former settling lagoons, Sancap Abrasives conducted six semi-annual groundwater monitoring events starting in June 1993 and ending in December 1995. During each monitoring event, groundwater samples were collected for all four monitoring wells and analyzed for dissolved metals, pH, specific conductance, oil and grease, TOC, total organic halogen, phenol, sulfate, nitrate, TDS, and acetone (Ref. S-14). According to the April 1996 groundwater monitoring report, a comparison of the semi-annual groundwater monitoring data with data collected in November 1988 (pre-closure) indicated that changes in groundwater quality following closure were not significant. Concentrations of TOC and acetone showed decreasing trends since the initial sampling event in November 1988. Arsenic and manganese concentrations, which had increased slightly following closure, had returned to pre-closure levels by December 1995. Selenium, silver, and thallium were not detected in any downgradient well during any of the six post-closure sampling events. Barium was only detected in the December 1995 event at a concentration of 0.01 mg/L. TDS and sulfate concentrations increased from 4,500 mg/L to 5,160 mg/L and 3,100 mg/L to 3,340 mg/L, respectively, since the initial monitoring event in November 1988. Lead concentrations decreased from 0.1 mg/L in the pre-closure sampling to non-detect in the June and December 1995 events. Because groundwater data collected over the three-year period of post-closure monitoring did not indicate significant degradation of groundwater quality, Sancap Abrasives recommended that no further groundwater monitoring be conducted at the closed lagoon site. Sancap Abrasives also recommended that the four existing monitoring wells (MW-1 through MW-4) be decommissioned in accordance with OEPA regulations (Ref. S-14). Following receipt of an approval letter from OEPA in August 1999, the facility decommissioned the four monitoring wells in September 1999, and submitted Water Well Sealing Reports to OEPA in October 1999 (Refs. S-18 and S-20).

A PA/VSI was conducted at the facility in October 1992. The PA/VSI identified nine SWMUs. No further action was recommended for five of these SWMUs. The only additional investigation recommendations were for SWMU 3, which were subsequently addressed during closure of the former settling lagoons (Ref. S-11).

II. Summary of SWMUs

A total of nine SWMUs were identified through the PA/VSI process. Each of these areas is discussed below. The locations of the SWMUs were provided as Figure 2 of the PA/VSI Report (Ref. S-9), which is included as Attachment A to this Letter Report. No formal areas of concern (AOCs) were identified in the PA/VSI report.

SWMU 1 – Former Regulated Hazardous Waste Storage Area

Description and Release History

The Former Regulated Hazardous Waste Storage Area consists of a 60-foot by 50-foot area in the eastern part of the Chemical Product Storage Building that was formerly used for storage of hazardous and nonhazardous wastes in 55-gallon drums. Specifically, MEK-containing hazardous waste was managed in this unit for periods longer than 90 days between 1980 and 1983. This unit is located on a concrete floor with no drains. At the time

of the VSI, this unit was being used for management of approximately 120 drums of hardened resin in open 55-gallon steel drums. According to the PA/VSI, this hardened resin had been left by SIA before the facility was sold to Robert Stuhlmiller in 1992. No signs of spills, leaks or solvent odor were noted at the time of the VSI (Ref. S-11).

In April 1981, Sancap Abrasives submitted a closure plan for this unit, and RCRA closure was completed in January 1983. Closure was accomplished through removal of hazardous wastes and decontamination of the area. No sampling was conducted as part of the RCRA closure activities. Nevertheless, EPA and OEPA approved RCRA closure of this unit in 1983. No releases from this unit have been documented (Refs. S-4, S-5, and S-11).

Release Control, Response Actions, and Environmental Data

The PA/VSI recommended that Sancap Abrasives arrange for proper disposal of the hardened resin drums (Ref. S-11).

Data Gaps

~~It is unknown whether the hardened resin drums have been properly disposed.~~

SWMU 2 – Current Hazardous Waste Accumulation Area

Description and Release History

The facility's Current Hazardous Waste Accumulation Area consists of a 10-foot by 10-foot area in the western portion of the Chemical Product Storage Building. This indoor area was previously used to accumulate 55-gallon drums of spent MEK (F005) for less than 90 days. The unit is equipped with a concrete floor and a ventilation system to prevent the buildup of flammable vapors. The unit began operation in January 1983 and became inactive in 1985 or 1986, when Sancap Liner stopped using MEK to clean equipment and Sancap Abrasives and Sancap Liner began recycling all their waste on site. No releases from this unit have been documented (Ref. S-11).

At the time of the VSI, no hazardous waste was being accumulated at this unit. Oil-type stains were observed throughout the building, including in the waste accumulation area. Numerous product drums were stored throughout the building (Ref. S-11).

Release Control, Response Actions, and Environmental Data

No further action was recommended for this SWMU in the PA/VSI (Ref. S-11).

Data Gaps

None

SWMU 3 – Former Settling Lagoons

Description and Release History

The Former Settling Lagoons were in operation from 1977 to 1987. Each of the four lagoons was unlined and used for management of wastewater generated during cleaning of the abrasive coating line. Lagoons 1 through 3 were excavated into native soil by SIA. Lagoon 4 was a borrow pit formed by excavation of berm material. Lagoon 1 was approximately 140 feet wide by 130 feet long by 4 feet deep. Lagoon 2 was approximately 170 feet wide by 120 feet long by 4 feet deep. Lagoon 3 was approximately 140 feet square by 3 feet deep. Lagoon 4 was approximately 120 feet square by 3 feet deep. Lagoons 1 and 2 were used for treatment of nonhazardous wastewater generated from equipment cleaning operations. Lagoon 1 was used for aeration of the wastewater, while Lagoon 2 served as a subsequent settling basin and discharge point. Rainwater collected in Lagoon 3 was also discharged into Lagoon 2. The combined wastewaters from Lagoon 2 were then discharged to the City of Alliance sanitary sewer system. Lagoon 4 was used to provide soil for berm construction and occasionally dilution water. At the time of the VSI, this unit was undergoing non-RCRA closure under guidance from OEPA (Ref. S-11).

A release to on-site soils occurred from this unit. Sampling and analyses of lagoon sediment and water conducted in 1988 indicated that Lagoons 1 and 2 exhibited the greatest impact. Both groundwater and sediment from these lagoons had elevated concentrations of phenol, TOC, and barium. Hazardous waste characterization of the sediments in the lagoons indicated that the sediments were not ignitable, corrosive, or characteristically toxic under RCRA. However, Lagoon 1 had elevated sulfide reactivity levels, which were reportedly attributed to natural, swamplike conditions (Refs. S-9 and S-11).

Release Control, Response Actions, and Environmental Data

No release controls were located at this unlined unit. As a result, closure activities were initiated at this unit in April 1993, in accordance with OEPA regulations and the Permit to Install. Closure activities consisted of draining standing water from the lagoons, stabilizing lagoon sediments with cement kiln dust, and backfilling the lagoons with berm material. Closure of this unit was completed in October 1993, and Sancap Abrasives submitted a Certification of Closure for the Former Settling Lagoons to OEPA in March 1994 (Refs. S-12 and S-13).

As required by the Permit to Install, Sancap Abrasives performed six semi-annual groundwater monitoring events at this unit, starting in June 1993 and ending in December 1995. During each monitoring event, groundwater samples were collected and analyzed for dissolved metals, pH, specific conductance, oil and grease, TOC, total organic halogen, phenol, sulfate, nitrate, TDS, and acetone. TDS, manganese, and sulfate were detected above OEPA secondary drinking water standards in monitoring wells both upgradient and downgradient of the lagoons (Ref. S-14). A comparison of all collected groundwater data was presented in the April 1996 Groundwater Monitoring Report. The report stated that "changes in groundwater quality following closure have been relatively slight. The most

significant changes since closure are decreases in thallium and acetone concentrations to non-detected levels. Based on the pre-closure and post-closure monitoring, the impact of the former impoundments on groundwater quality is not considered significant.” The report recommended that no further groundwater monitoring be conducted at the closed lagoon site, and that the four existing groundwater monitoring wells be decommissioned in accordance with OEPA regulations. No further groundwater sampling was conducted, and the four groundwater monitoring wells were decommissioned with OEPA approval in 1999 (Refs. S-14, S-17, and S-18).

Data Gaps

None

SWMU 4 – Wastewater Sumps

Description and Release History

This unit consists of three outdoor, underground, lined, concrete sumps: east, west, and central. The west sump is 15 feet long by 10 feet wide by 5.5 feet deep. The central sump is 12 feet long by 10 feet wide by 6 feet deep. The east sump is 15 feet long by 10 feet wide by 6.5 feet deep. The sumps were used between 1977 and 1988 for management of wastewater from cleaning of the abrasive coating line. Wastewater accumulating in the east and west sumps gravity drained to the central sump, and then was pumped to the Former Settling Lagoons (SWMU 3). From 1988 to the present, this wastewater has instead been discharged to the Wastewater Pretreatment Unit (SWMU 5). No releases from SWMU 4 have been documented, and no visible signs or evidence of a release were present during the VSI (Ref. S-11).

Release Control, Response Actions, and Environmental Data

According to the PA/VSI, the sumps are lined with an impervious liner and covered to prevent releases to the air. No further action was recommended for this SWMU in the PA/VSI (Ref. S-11).

Data Gaps

None

SWMU 5 – Wastewater Pretreatment Unit

Description and Release History

This unit manages wastewater from abrasive coating line cleaning. This unit consists of a 1,500-gallon aboveground fiberglass tank located indoors above a concrete floor. Wastewater from the Center Sump (SWMU 4) is pumped to this unit, where the pH is adjusted, if necessary, to meet the facility’s allowable discharge pH range of 6-10. Sancap

Abrasives discharges wastewater from this unit to the sanitary sewer system under City of Alliance Permit Number 216-A. The unit began operation prior to 1988 and was active at the time of the PA/VSI. No releases from this unit have been documented, and no visible signs or evidence of a release were observed in the area during the PA/VSI (Ref. S-11).

Release Control, Response Actions, and Environmental Data

Because the tank is located aboveground, leaks would be easily and promptly detected. The tank is located in a dedicated concrete room with a concrete floor to contain potential leaks until they can be properly cleaned up. No further action was recommended for this SWMU in the PA/VSI (Ref. S-11).

Data Gaps

None

SWMU 6 – Abrasive Roll-Off Box

Description and Release History

This unit consists of a 40-cubic yard steel roll-off box that manages trash and waste trim from Sancap Abrasives operations. The abrasive waste is inert, nonhazardous, and nonliquid. The roll-off box is located outdoors on a concrete pad. The roll-off box is emptied twice per week, with waste being landfilled at one of three Ohio landfills. This unit began operations around 1985 and was active at the time of the PA/VSI. During the VSI, no visible signs or evidence of a release were noted in the area of this unit (Ref. S-11).

Release Control, Response Actions, and Environmental Data

No further action was recommended for this SWMU in the PA/VSI (Ref. S-11).

Data Gaps

None

SWMU 7 – Solvent Still

Description and Release History

The Solvent Still is used to recover spent methylene chloride (F002) from machine cleaning activities. The still is located indoors on a concrete floor and is approximately 2 feet by 2 feet by 3.5 feet in size. Waste solvents are managed in 15-gallon quantities. Methylene chloride still bottoms (F002) are generated during annual Solvent Still cleaning operations. At the time of the VSI, the facility was disposing of still bottoms from this unit by putting them in the Liner Roll-off Box (SWMU 9). This unit was placed into service around 1985 or 1986 and was active at the time of the PA/VSI. During the VSI, no visible signs or evidence

of a release or drains were noted in the area of this unit. Furthermore, no releases from this unit have been documented (Ref. S-11).

Release Control, Response Actions, and Environmental Data

The PA/VSI recommended that the facility manage and accumulate the waste methylene chloride still bottoms (F002) from this unit as a hazardous waste (Ref. S-11).

Data Gaps

The current status of this unit is unknown. More importantly, it is not clear that RCRA hazardous methylene chloride still bottoms are being properly managed. Commingling of RCRA hazardous wastes with solid waste in a roll-off box that does not meet RCRA hazardous waste container requirements could constitute illegal storage of those wastes. Moreover, unless the entire contents of the roll-off box (after commingling) were managed as hazardous waste, Sandcap could be in violation of RCRA hazardous waste disposal requirements.

SWMU 8 – Used Oil Storage Drum

Description and Release History

This unit consists of a 55-gallon steel drum that is used to accumulate used oil from equipment maintained by QRM. When a sufficient volume of used oil has been collected, the waste oil is transported to the SafetyKleen facility in Cleveland, Ohio for recycling. The drum is located on a concrete floor inside QRM's section of the primary facility building. This unit was placed into service in February 1992 and was still active at the time of the PA/VSI. No releases from this unit have been documented, and no visible signs or evidence of a release were present during the VSI (Ref. S-11)

Release Control, Response Actions, and Environmental Data

This unit is located indoors on a concrete floor. At the time of the PA/VSI, the drum was equipped with a covered funnel, and was kept closed unless waste oil was being added. No further action was recommended for this SWMU in the PA/VSI (Ref. S-11).

Data Gaps

None

SWMU 9 – Liner Roll-Off Box

Description and Release History

This 40-cubic yard roll-off box is used for management of liner waste trim from Sancap Liner. The waste trim is inert, nonhazardous, and nonliquid. The Liner Roll-off Box is

emptied twice per week, and its contents are transported by Max Disposal to one of three Ohio landfills. This unit was placed into service around 1985 and was active at the time of the PA/VSI. In addition to trim wastes, this unit has reportedly received hazardous wastes. When the Solvent Still (SWMU 7) is cleaned (about once a year), the methylene chloride still bottoms (F002) are thrown into the Liner Roll-off Box for disposal. However, no release has been documented from this unit, and no visible signs or evidence of a release were present during the VSI (Ref. S-11).

Release Control, Response Actions, and Environmental Data

The Liner Roll-off Box is located outdoors on a concrete pad in a covered area. The PA/VSI recommended that the facility manage and dispose of the methylene chloride still bottoms (F002) as a hazardous waste (Ref. S-11).

Data Gap

The current status of this unit is unknown. More importantly, it is not clear that RCRA hazardous methylene chloride still bottoms are being properly managed. Commingling of RCRA hazardous wastes with solid waste in a roll-off box that does not meet RCRA hazardous waste container requirements could constitute illegal storage of those wastes. Moreover, unless the entire contents of the roll-off box (after commingling) were managed as hazardous waste, Sancap could be in violation of RCRA hazardous waste disposal requirements.

IV. Recommendations and Next Steps

Based on a review of available file materials, the following additional actions are recommended for the Sancap Abrasives site:

1. No further action is recommended for SWMUs 1, 2, 3, 4, 5, 6, and 8.
2. Additional information should be obtained or interviews should be conducted with Sancap Liner representatives regarding the status of SWMUs 7 and 9 and whether the methylene chloride still bottoms are being properly managed as hazardous waste.

V. References

Document Date	Title	Author	Reference (S-#)
November 18, 1980	Part A Hazardous Permit Application	Sancap Abrasives	S-1
April 1, 1981	Closure Plan (Hazardous Waste Storage Area)	Sancap Abrasives	S-2
June 25, 1982	Interim Permit Application Withdrawal Request	Sancap Abrasives	S-3
June 20, 1983	Letter Re: Closure Certification	D. F. Monnot P.E.	S-4

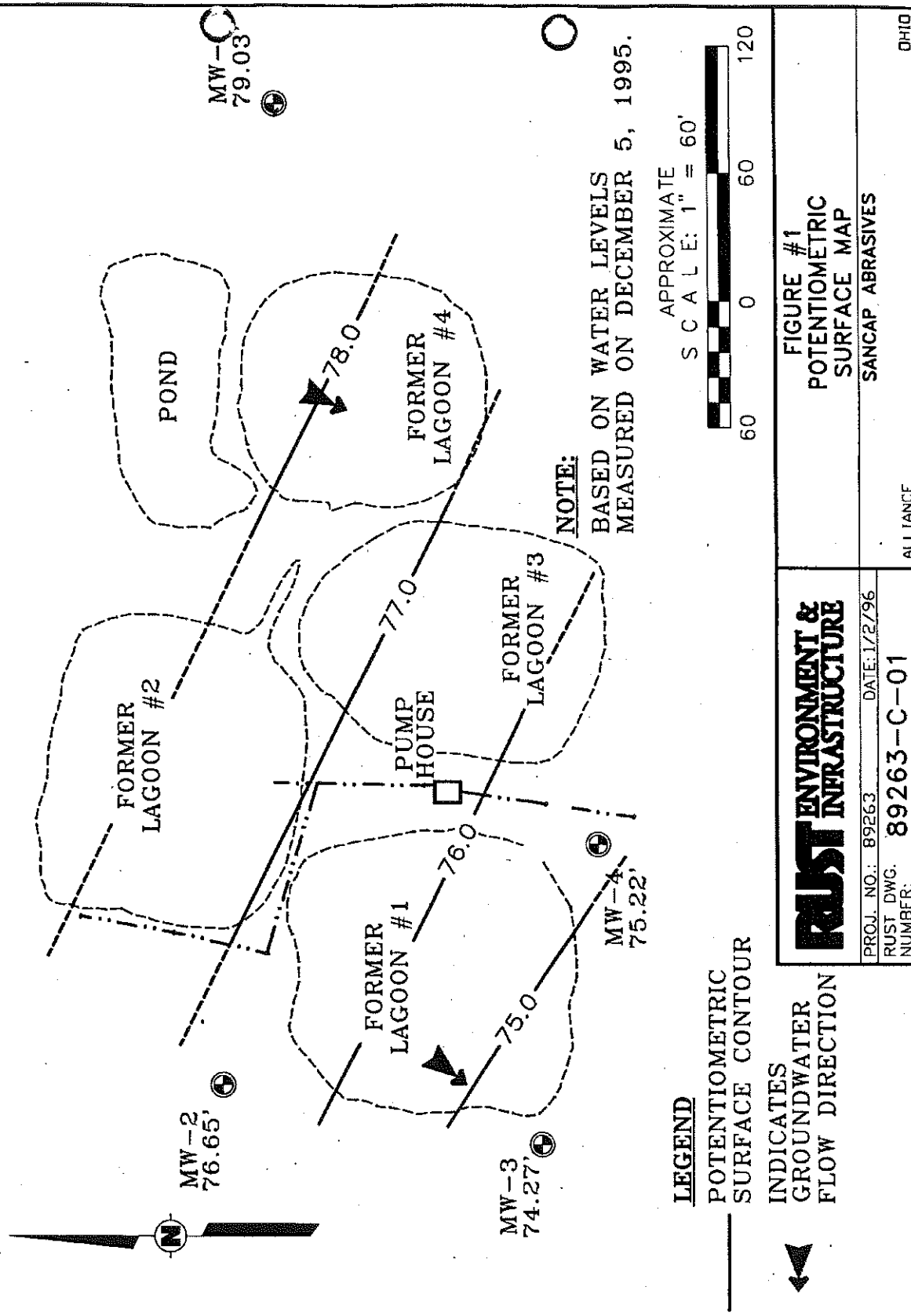
Document Date	Title	Author	Reference (S-#)
February 8, 1983	Approval of Closure of Drum Storage Area	EPA	S-5
March 22, 1983	Approval of Withdrawal of Part A Permit Application	EPA	S-6
April 8, 1983	Compliance Inspection	OEPA	S-7
June 21, 1983	Compliance Reinspection (Notice of Compliance)	OEPA	S-8
February 6, 1990	Sampling and Analysis Plan for Lagoon #1	Lancey	S-9
November 10, 1991	Complaint Investigation Form	OEPA	S-10
March 19, 1993	Preliminary Assessment/Visual Site Inspection	PRC Environmental Management	S-11
November 24, 1993	Closure Letter for Wastewater Treatment Lagoons	RUST	S-12
March 1994	Certification of Closure – Wastewater Treatment Lagoons	RUST	S-13
April 2, 1996	Groundwater Monitoring Report – Former Wastewater Treatment Lagoon Site – December 1995 Monitoring	RUST	S-14
October 7, 1998	Sancap Liner Technology, Inc. Wastewater Discharge	OEPA	S-15
December 18, 1998	Sancap Liner Technology, Inc. Wastewater Discharge to Sanitary Sewer	Sancap Liner Technology	S-16
June 17, 1999	Request to Decommission Groundwater Monitoring Wells	Earth Tech	S-17
August 24, 1999	Approval to Decommission Groundwater Monitoring Wells	OEPA	S-18
September 26, 1999	Transfer Notification	Lexington Abrasives/ DBA Sancap Abrasives	S-19
October 22, 1999	Water Well Sealing Reports	Earth Tech	S-20
October 27, 1999	Letter issuing NPDES Permit OH0063576 to Sancap Abrasives Corporation	OEPA	S-21
January 26, 2000	NPDES Permit Transfer	Sancap Abrasives	S-22
March 13, 2001	Installation Name Change	OEPA	S-23
December 2, 2004	NPDES Revocation Processing Form	OEPA	S-24
December 6, 2004	Letter regarding Non-Renewal of NPDES Permit	OEPA	S-25
December 2, 2011	RCRA Info/Facility Registry System	EPA	S-26

Attachment A

**Facility Layout and SWMU Locations
(Ref. S-11)**

Attachment B
Monitoring Well Locations
(Ref. S-14)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
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REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Gail Kittleson
Operations Manager
Sancap Abrasives, Inc.
16123 Armour Street
Alliance, Ohio 44601

Re: Visual Site Inspection
Sancap Abrasives, Inc.
Alliance, Ohio
OHD 093 298 700

289

Dear Mr. Kittleson:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Site: **Sancap Abrasives Inc.**
OHD 093 289 700

*State cleaned up
problem*

Corrective Action Prioritization: **High**

Site Activities

The Sancap facility has three business operating under the same U.S. EPA id number. The businesses are Sancap Abrasives, Sancap Liner, and Quality Repair and Maintenance. Sancap Abrasives manufactures coated abrasives, primarily sandpaper. Sancap Liner produces coated products, primarily bottle cap liners. Quality Repair and Maintenance maintains the Sancap Abrasive and Sancap Liners equipment. The Sancap businesses have one ownership and the Quality Repair and Maintenance is independently owned.

Issues in 1992

Former Regulated Hazardous Waste Storage Area

In this area approximately 150 open-head 55 gallon steel drums containing hardened resin (non-hazardous waste) are stored.

Settling Lagoons

The lagoons used to received non-hazardous alkaline wastewater from the cleaning of the abrasive coating line (this occurred under a previous owner). The site now pre-treats the wastewater to moderate its pH. The water is then sent to a sewer system under the facility's wastewater discharge permit.

Liner Roll-Off Box

A small amount of methylene chloride still bottoms were being thrown into the roll-off box for disposal.

This site, under the previous ownership, had several solvent waste streams. The site does not appear to produce much hazardous waste as of 1992.

Summary

The settling lagoons sediment contained elevated concentrations of phenol, total organic carbon and barium. Groundwater monitoring around the settling lagoons possibly indicated a change in pH and slight acetone contamination (from pH of 6.5 and acetone not detected up-gradient to a pH of 8.6 and acetone 100 parts per billion down-gradient of the lagoons). The groundwater is used as private drinking water with a well located 500 feet southwest of the facility. The facility was undergoing non-RCRA closure procedures for the lagoons under the guidance of the Ohio EPA in 1992. The OEPA states that the site has finished this process.

Site was rated High because of a possible barium release to groundwater. Recent groundwater sampling refutes this issue.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**SANCAP ABRASIVES, INC.
ALLIANCE, OHIO
OHD 093 289 700**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	OHD 093 289 700
Date Prepared	:	March 19, 1993
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032OH33
Prepared by	:	PRC Environmental Management, Inc. (Cathy M. Collins)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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ENFORCEMENT
CONFIDENTIAL

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Sancap Abrasives, Inc. (Sancap Abrasives) facility in Alliance, Stark and Mahoning Counties, Ohio. The facility property is located in both Stark and Mahoning Counties. The facility building is located in Stark County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs identified.

Currently three businesses occupy the Sancap Abrasives facility: Sancap Abrasives; Sancap Liner, Inc. (Sancap Liner); and Quality Repair and Maintenance (QRM). All three businesses operate under the original Sancap U.S. EPA identification number. Sancap Abrasives manufactures coated abrasives, primarily sandpaper. Sancap Liner produces coated products, primarily bottle cap liners. QRM is responsible for maintaining the equipment at Sancap Abrasives and Sancap Liner. The facility generates and manages the following waste streams: methylene chloride (F002); methylene chloride still bottoms (F002); nonhazardous wastewater; abrasive and liner trim; used oil; and hardened resin. Sancap Abrasives and Sancap Liner currently operate as small quantity generators of hazardous waste. The Sancap Abrasives facility occupies 280 acres in a mixed-use residential and agricultural area in Alliance, Ohio, and employs about 110 people. On November 18, 1980, Sancap Abrasives submitted a RCRA Part A permit application for the Regulated Hazardous Waste Storage Area (SWMU 1). On June 25, 1982, Sancap requested withdrawal of the hazardous waste storage permit because it was not storing hazardous wastes on site for greater than 90 days. Sancap completed closure of SWMU 1 in 1983. OEPA approved withdrawal of the Part A permit application on November 14, 1983. *Settling Lagoons & wastewater sumps* sampling activities were required as part of this closure.

The PA/VSI identified the following nine SWMUs at the facility:

Solid Waste Management Units

1. Former Regulated Hazardous Waste Storage Area
2. Current Hazardous Waste Accumulation Area
3. Settling Lagoons
4. Wastewater Sumps
5. Wastewater Pretreatment Unit
6. Abrasive Roll-Off Box
7. Still
8. Used Oil Storage Drum
9. Liner Roll-Off Box

RELEASE
DATE _____
RIN # _____
INITIALS *PRC*

ENFORCEMENT
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The facility originally operated as Turner Aircraft (Turner). During World War II, Turner manufactured light observation aircraft. Turner went bankrupt and the facility was bought in 1948 by Armour Meat Packing. Armour used the facility to manufacture upholstery and adhesives. These operations used animal glues manufactured from animals slaughtered by Armour Meat Packing. In 1970, Greyhound Motor Coach bought the facility and owned it for approximately two weeks. No additional information was available on Greyhound's operations. Greyhound sold the facility to a subsidiary of Azko Corporation, which operated the facility as Armak Corporation. Armak manufactured coated abrasives and liners at the facility. In 1978, Swiss Industrial Abrasive (SIA) purchased the facility and renamed it Sancap Abrasives. In 1986, SIA changed the facility's name from Sancap to SIA America. Facility operations remained the same. In 1988, Robert Stuhlmiller purchased the liner coating division and renamed it Sancap Liner. In 1992, Stuhlmiller purchased the abrasive operations division and renamed it Sancap Abrasives. QRM began operations in February 1992. Stuhlmiller currently owns both Sancap Abrasives and Sancap Liner. QRM is owned by Tom Chiappini and Chuck Sefert.

From 1977 to 1987, Sancap Abrasives discharged wastewater from abrasive coating clean up operations to the Settling Lagoons (SWMU 3). According to a Sancap representative, in the early 1980's, the Sancap facility was required to either close or line the Settling Lagoons (SWMU 3). In 1987, Sancap chose to close the lagoons, and hired a contractor to conduct sampling as part of the closure. Sancap is currently completing a non-RCRA closure of these lagoons. *

The potential for release from all SWMUs to groundwater and surface water is low. SWMUs 1, 2, 7, and 8 are located indoors on concrete floors, and manage waste in containers with capacities of 55 gallons or less. SWMU 6 manages a nonliquid waste and is on a concrete pad. SWMU 9 is closed on all sides and is located on a concrete pad. SWMU 5 manages a potentially caustic wastewater in a dedicated room with a concrete floor. SWMU 4 is lined with an impervious liner to prevent releases. Ground water sampling downgradient of the Settling Lagoons (SWMU 3) does not indicate elevated concentrations of constituents present in the settling lagoon sediment. In addition, the soils in SWMU 3 have a low permeability and may act as a natural liner.

The potential for release to air from SWMUs 1, 2, 3, 4, 5, 6, 7, and 8 is low. SWMUs 1, 2, 7, and 8 manage wastes in closed containers. SWMUs 3 and 4 manage nonvolatile aqueous wastes in closed containers. SWMU 5 manages an aqueous waste containing nonvolatile constituents. SWMU 6 manages a nonliquid waste in a closed container. The potential for release from SWMU 9 is moderate to high. Methylene chloride still bottoms (F002) are disposed of into SWMU 9. Any entrained liquid could volatilize and be released because SWMU 9 is not tightly sealed.

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ENFORCEMENT
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A release to on-site soils has occurred from SWMU 3. Both water and sediment in SWMU 3 have indicated elevated concentrations of phenol, total organic carbon, and barium. The potential for release from SWMUs 1, 2, 4, 5, 6, 7, 8, and 9 is low. SWMUs 1, 2, 7, and 8 are located on concrete floors and manage waste in containers with capacities of 55 gallons or less. SWMU 6 manages a nonliquid waste in a closed container. SWMU 5 manages a potentially caustic wastewater in a dedicated room with a concrete floor. SWMU 4 is lined with an impervious liner in order to prevent releases.

The nearest residence is located 100 feet south of the facility. Facility access is partially restricted by a 6-foot fence along the southern and eastern sides of the facility. The nearest surface water body, the Mahoning River, is located 1 mile west of the facility and is used for surface drainage. The Deer Creek Reservoir, which is located about three miles northwest of the facility, is used as a municipal drinking water source. Ground water is used as a drinking water supply for the area. The nearest drinking water well is located 500 feet southwest and downgradient of the facility. Sensitive environments are not located on site. The nearest sensitive environment, located 2,000 feet northwest of the facility, is a permanent palustrine open water system that is permanently exposed.

PRC recommends that the facility manage and dispose of the methylene chloride still bottoms (F002) as a hazardous waste. PRC also recommends that the facility continue with closure activities for the Settling Lagoons (SWMU 3). PRC also recommends that the facility arrange for the disposal of drums of hardened resin in the Former Regulated Hazardous Waste Storage Area (SWMU 1). PRC recommends no further action for all other facility SWMUs.

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DATE 12/10/01
RIN # 2001
INITIALS MDK

ENFORCEMENT
CONFIDENTIAL

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Sancap Abrasives, Inc. (Sancap Abrasives) facility (EPA Identification No. OHD 093 289 700) in Alliance, Stark and Mahoning Counties, Ohio. The facility property is located in both Stark and Mahoning Counties. The facility building is located in Stark County, Ohio. The PA was completed on October 26, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. PRC also used information from the U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), U.S. Department of the Interior (USDI), Federal Emergency Management Agency (FEMA), and the U.S. Geologic Survey (USGS). The VSI was conducted on October 27, 1992. It included interviews with

facility representatives and a walk-through inspection of the facility. PRC identified nine SWMUs and no AOCs at the facility.

The VSI is summarized and 14 inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B. Analytical results from ground-water sampling conducted at the Settling Lagoons (SWMU 3) are included in Attachment C. Analytical results from the hardened resin are included in Attachment D.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The Sancap Abrasives facility is located at 16123 Armour Street N.E. in Alliance, Stark and Mahoning Counties, Ohio. Currently three businesses are located at the former Sancap Abrasives facility: Sancap Abrasives; Sancap Liner Technology, Inc. (Sancap Liner); and Quality Repair and Maintenance (QRM). The facility's Part A permit application was originally submitted by Sancap Abrasives. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 40°56'45" N and longitude 81°05'30" W). The facility occupies 280 acres in a mixed-use residential and agricultural area.

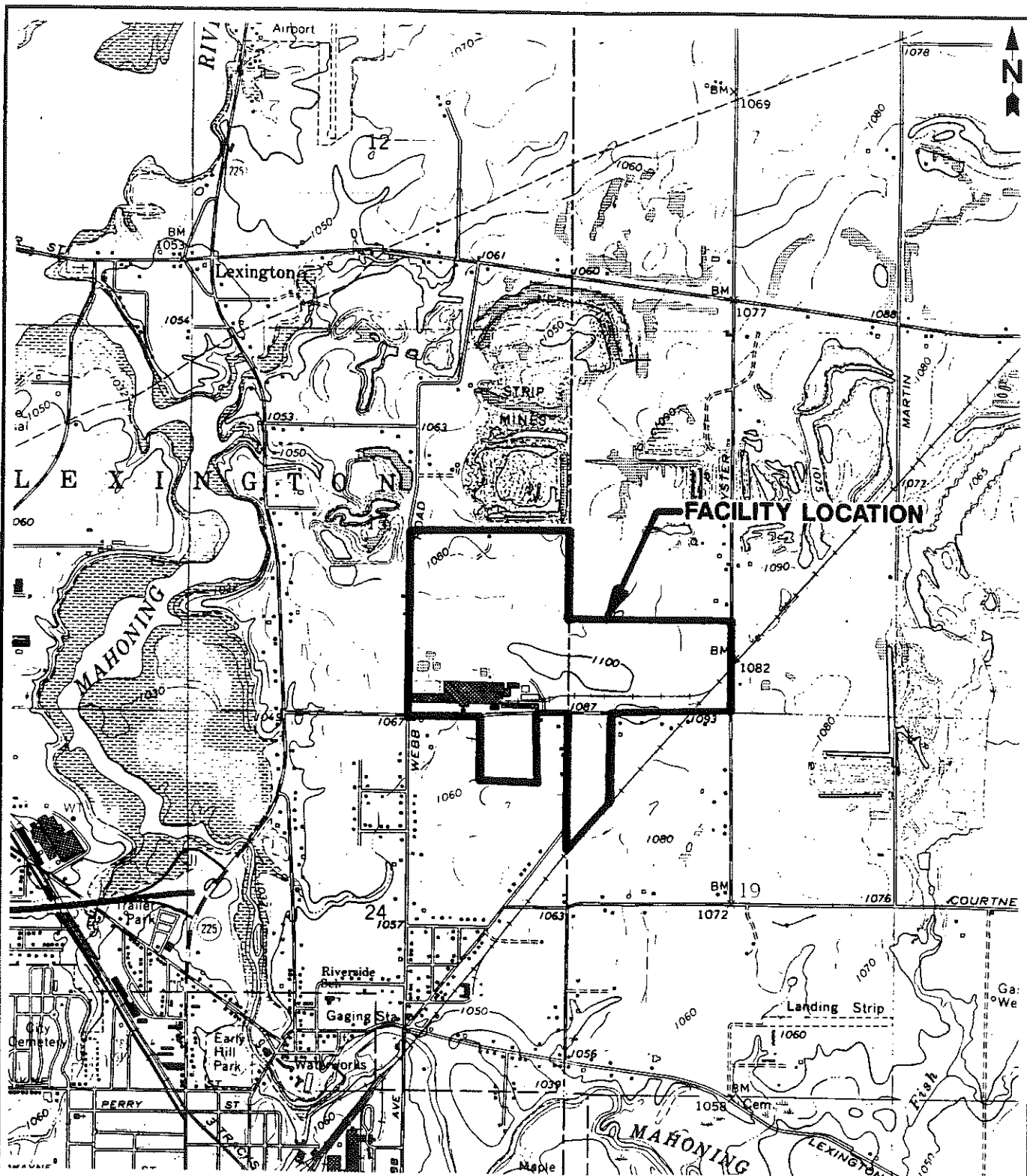
The facility is bordered on the north by a wooded area and strip mines, and on the west, south, and east by residences and farms.

2.2 FACILITY OPERATIONS

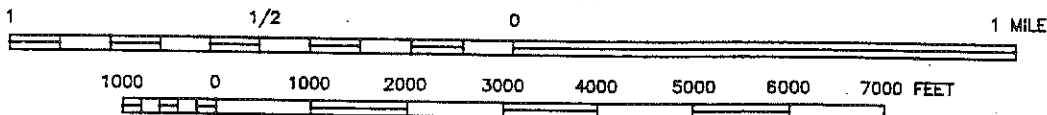
Currently three separate businesses occupy the facility building: Sancap Abrasives; Sancap Liner; and QRM.

Sancap Abrasives, located on the west side of the facility, manufactures several different coated abrasives, but it primarily produces sandpaper. The abrasive coating process is begun by applying adhesives and abrasive grains to the backing of either paper or cloth web. Then the coated web is dried in an oven. Finally, the coated web is reduced to various sizes by converting operations to make disks and belts. Raw materials used in the manufacturing process include resins, animal glues, silica carbide grains, aluminum oxide grains, paper, and cloth.

Sancap Liner, located on the east side of the facility, produces several different coated products, but it primarily produces bottle cap liners. Operations at Sancap Liner consist of receiving rolls of uncoated liners, placing the rolls on coating machines, and then coating the rolls with adhesives, polyvinyl acetate, or paraffin. Excess material is then trimmed from these rolls. The coated rolls are then printed and shipped to an off-site facility for stamping. Operations at Sancap Liner are conducted under the supervision of the Food and Drug Administration, since these operations involve food packaging.



SCALE 1:24000



SCALE: 1" = 2,000'



QUADRANGLE LOCATION

SANCAP ABRASIVES, INC.
ALLIANCE, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

QRM is located between Sancap Abrasives and Sancap Liner. QRM performs maintenance on machinery at both facilities. Operations include changing oils, maintaining equipment, and some metal cutting. QRM began operations in February 1992.

The facility occupies 280 acres. The Settling Lagoons (SWMU 3) are located north of the coating area in Sancap Abrasives. North of the Settling Lagoons is a wooded area used by employees for hunting and fishing. The portion of the facility northeast of the main building was formerly an airport and a dilapidated runway is visible in this area. An aircraft hangar is located at the eastern edge of the facility and is currently used to store furniture and unsalable products. The primary building at the facility occupies 625,000 square feet. The Sancap Abrasives facility contains a 700-foot-long cloth and paper adhesive coating line, the Wastewater Pretreatment Unit (SWMU 5), and storage areas. The Sancap Liner facility contains converting operations and a lab which performs physical measurements on the liners. A separate building, the chemical product storage building, contains the Current Hazardous Waste Accumulation Area (SWMU 2), which includes product storage area, and the Former Regulated Hazardous Waste Storage Area (SWMU 1). The facility also has two 20,000 gallon aboveground storage tanks in a diked area; these tanks formerly contained heating oil. The ovens and boilers at the facility currently use natural gas. A 6-foot fence is located along the southern and western sides of the facility. The facility employs about 110 people.

The Sancap Abrasives facility originally operated as Turner Aircraft (Turner). During World War II, Turner manufactured light observation aircraft. Turner went bankrupt and the facility was bought in 1948 by Armour Meat Packing. Armour used the facility for upholstery and adhesive operations. These operations used animal glues manufactured from animals slaughtered by Armour Meat Packing. In 1970, Greyhound Motor Coach bought the facility and owned it for approximately two weeks. No additional information on Greyhound operations was available. Greyhound sold the facility to a subsidiary of Azko, which operated the facility as Armak Corporation. Armak manufactured coated abrasives and liners at the facility. In 1978, Swiss Industrial Abrasive (SIA) purchased the facility and renamed it Sancap Abrasives. In 1986, SIA changed the facility's name from Sancap Abrasives to SIA America. Facility operations remained the same. In 1988, Robert Stuhlmiller purchased the liner coating division and named it Sancap Liner. In 1992, Stuhlmiller purchased the abrasive operations division and renamed it Sancap Abrasives. QRM began operations in February 1992. Stuhlmiller currently owns Sancap Abrasives and Sancap Liner. QRM is owned by Tom Chiappini and Chuck Sefert.

2.3

WASTE GENERATION AND MANAGEMENT

The facility currently generates the following hazardous and nonhazardous wastes: waste methylene chloride (F002); methylene chloride still bottoms (F002); nonhazardous wastewater; abrasive and liner trim; used oil; and hardened resin. In the past, the facility generated an additional waste solvent stream consisting of methyl ethyl ketone (MEK) (F005). The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Waste methylene chloride (F002) is generated from cleaning equipment used in the coating of bottle cap and food liners. The waste methylene chloride is accumulated in drums at the Still (SWMU 7) and recovered on site in the Still (SWMU 7). The still is operated about 8 hours, once every two weeks, distilling about 15 gallons per operation (PRC, 1992).

Methylene chloride still bottoms (F002) are generated when the Still (SWMU 7) is cleaned. According to the facility representatives, about once per year the Still (SWMU 7) was cleaned and a "handful" of bottoms are thrown into the Liner Roll-Off Box (SWMU 9). The Liner Roll-Off Box (SWMU 9) is emptied twice per week and is transported by Max Disposal to its transfer facility in Alliance, Ohio. The waste is then landfilled at one of the following landfills: G & G Landfill in Carrollton, Ohio; American Landfill in Malvern, Ohio; and Kimbell Landfill in Dover, Ohio.

Sancap Abrasives generates approximately 100 gallons of nonhazardous wastewater per day. Nonhazardous wastewater is generated from cleaning sumps and process equipment at the abrasive coating machine. The wastewater is collected in the east and west Wastewater Sumps (SWMU 4) and gravity fed to the central Wastewater Sump (SWMU 4). The wastewater is then pumped to the Wastewater Pretreatment Unit (SWMU 5) where the pH level of the wastewater is monitored. If necessary, the pH level is adjusted so the wastewater is within criteria set forth in the wastewater discharge permit issued to the facility by the City of Alliance. The wastewater is then discharged to the sanitary sewer. Until 1978, the wastewater was pumped from the center sump to the Settling Lagoons (SWMU 3) before the wastewater was pumped back to the facility and discharged to the city sewer system.

Abrasive and liner trim are generated by the converting operations at the Sancap Abrasive and Sancap Liner facilities. The excess abrasive trim is accumulated in the Abrasive Roll-Off Box (SWMU 6). Excess trim from Sancap Liner is accumulated in the Liner Roll-Off Box (SWMU 9). The roll-off boxes are emptied twice per week and the contents are transported by Max Disposal to its transfer facility in Alliance, Ohio. The waste is ultimately landfilled at

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Former Regulated Hazardous Waste Storage Area	Yes	This unit was RCRA closed on November 14, 1983; currently stores nonhazardous waste
2	Current Hazardous Waste Accumulation Area	No	Inactive; this unit accumulated hazardous waste for less than 90 days
3	Settling Lagoons	No	Inactive
4	Wastewater Sumps	No	Active
5	Wastewater Pretreatment Unit	No	Active
6	Abrasive Roll-Off Box	No	Active
7	Still	No	Active
8	Used Oil Storage Drum	No	Active
9	Liner Roll-Off Box	No	Active

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit</u>
Methylene Chloride/F002	Cleaning Equipment	7
Methylene Chloride Still Bottoms/F002	Recovering Solvents	7 and 9
Wastewater/NA	Abrasive Coating Line Cleanup	3, 4, and 5
Abrasive and Liner Trim/NA	Abrasive and Liner Converting Operations	6 and 9
Used Oil/NA	Equipment Maintenance	8
Hardened Resin/NA	Mixing Resins	1
MEK/F005 ^b	Cleaning Equipment	1 and 2

Notes:

^a Not applicable (NA) designates nonhazardous waste.

^b No longer generated

one of the following landfills: G & G Landfill in Carrollton, Ohio; American Landfill in Malvern, Ohio; and Kimbell Landfill in Dover, Ohio.

QRM generates used oil from various equipment maintenance activities. The used oil is accumulated in a 55-gallon steel drum at the Used Oil Storage Drum (SWMU 8). The waste is then transported by Safety-Kleen Corporation (Safety-Kleen) to the Safety-Kleen facility in Cleveland, Ohio. QRM generates 100 to 150 gallons of waste oil annually.

Hardened resin is generated from the manufacture of coated abrasives. After the self-hardening resins are applied to cloth or paper, the excess resin is placed in 55-gallon drums at the Former Regulated Hazardous Waste Storage Area (SWMU 1). The hardened resin is transported by Enviroco Transportation, Inc., to American Landfill, Inc., in Waynesburg, Ohio. Sancap Abrasives generates about 144,000 pounds of this waste annually. Analytical results of this waste are included in Attachment D.

Until 1985 or 1986, Sancap Liner generated an MEK waste (F005) from cleaning equipment. This waste was accumulated in 55-gallon drums at the Former Regulated Hazardous Waste Storage Area (SWMU 1). After the Former Regulated Hazardous Waste Storage Area (SWMU 1) underwent RCRA closure on November 14, 1983, MEK waste (F005) was accumulated at the Current Hazardous Waste Accumulation Area (SWMU 2). This waste was transported off site for disposal. According to facility representatives, the waste MEK is no longer generated on site.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

From 1977 to 1987, SIA discharged wastewater from rinsing procedures associated with its manufacturing process into a series of Settling Lagoons (SWMU 3) located north of the plant. After a production run in the coated abrasives area, the coating equipment and coating tanks were cleaned. Before the next formulation, the coating tanks were washed with an aqueous alkaline solution. The wastewater from the cleaning process has been analyzed and found to be nonhazardous. OEPA was aware of this process and considered the wastewater nonhazardous (OEPA, 1983b).

The treatment of wastewater in the lagoons occurred as follows: (1) wastewater from the sumps was discharged to the receiving lagoon (Lagoon 1); (2) wastewater from Lagoon 1 was

combined with water from the rain water collection lagoon (Lagoon 3); and (3) the wastewater was then discharged via an aeration stream to the discharge lagoon (Lagoon 2). The wastewater was ultimately discharged to the City of Alliance sewer system. Lagoon 4 served only to provide soil for berm construction and occasionally dilution water. Another pond, north of Lagoon 4, was created after the excavation of material for lagoon berms (Lancy Environmental Services Company [Lancy], 1989).

According to a Sancap representative, in the early 1980's the Sancap facility was required to either close or line the Settling Lagoons (SWMU 3). In 1987, Sancap chose to close the lagoons, and hired a contractor to conduct sampling as part of the closure. Four ground-water monitoring wells were installed as part of the Site Evaluation Report of the Settling Lagoons (SWMU 3) prepared by Lancy in 1989. The locations of these wells are shown in Figure 2. Monitoring Well 1 was installed upgradient of the Settling Lagoons (SWMU 3) to provide background concentrations. The remaining three wells were installed downgradient of the Settling Lagoons (SWMU 3). The ground water samples from these wells were analyzed for priority pollutant compounds, excluding pesticides, contamination indicators, water quality indicators, metals, acetone, MEK, and total xylene.

Sampling and analysis of lagoon sediment and water conducted in 1988 indicated that Lagoons 1 and 2 exhibited the greatest impact from the treatment operation. Both water and sediment in these lagoons had elevated concentrations of phenol, total organic carbon, and barium. The barium concentration in Lagoon 3 suggested that it may have occasionally received wastewater. Hazardous waste determinations of the sediments in the lagoons indicated that the sediments were not ignitable, corrosive, or extraction procedure toxic. The sulfide reactivity in Lagoons 3 and 4 was recorded as 496 milligrams per liter (mg/l) or less than the limit of 500 mg/l for the reactivity characteristic. The lack of significant concentrations of wastewater constituents indicated that the sulfide reactivity in Lagoons 3 and 4 was associated with natural, swamplike conditions (Lancy, 1989). Ground water sampling downgradient of the Settling Lagoons (SWMU 3) did not indicate that elevated concentrations of the constituents present in the Settling Lagoons (SWMU 3) were present in other areas (Lancy, 1989).

According to Lancy, the wastes present in Lagoons 1, 2, and 3 were classified as residual wastes and the sediment in Lagoon 4 was classified as naturally occurring (Lancy, 1989). OEPA approved Sancap's closure plan on May 21, 1992 (OEPA, 1992a).

PRC found no other records of documented releases at the facility.

2.5

REGULATORY HISTORY

Sancap Abrasives submitted a Notification of Hazardous Waste Activity Form to EPA on August 13, 1980 (Sancap Abrasives, 1980a). The facility indicated that it was a generator and storage facility. Sancap Abrasives submitted a RCRA Part A permit application on November 18, 1980 (Sancap Abrasives, 1980b). This application listed storage in containers with a 5,500-gallon capacity in the Former Regulated Hazardous Waste Storage Area (SWMU 1). The facility listed the F005 waste code annual generation rate as 10,000 pounds and D001 at 1,000 pounds. The facility also listed the following waste codes with the process description of "potential spill" and estimated annual quantities of 0: D002, U159, U220, U112, U125, U154, and U243 (Sancap Abrasives, 1980b).

On June 25, 1982, Sancap Abrasives requested withdrawal of the Part A permit application because they were not storing hazardous wastes on site for greater than 90 days (Sancap Abrasives, 1982). Sancap Abrasives completed RCRA closure SWMU 1 in 1983 (U.S. EPA, 1983). No sampling activities were required as part of this closure. OEPA approved withdrawal of the facility's permit on November 14, 1983 (OEPA, 1983c). The facility was issued a permit to install the closure of the Settling Lagoons on May 17, 1992 (OEPA, 1992a). Sancap Abrasives and Sancap Liner currently operate as small-quantity generators. Sancap Liner has reduced the quantity of waste sent off-site by recovering the waste solvents in a Still (SWMU 7) on site.

OEPA conducted RCRA compliance evaluation inspections in 1981 and 1983. No violations were noted during the 1981 inspection (OEPA, 1981). Violations noted during the April 1983 inspection included the following: (1) no chemical and physical analyses of wastes on file; (2) no waste analysis plan on file; (3) the facility did not control entry; (4) no inspection schedule and inadequate inspection frequency; (5) training deficiencies; (6) inadequate posting of the area; (7) contingency plan and operating record deficiencies; and (8) improper storage of hazardous waste (OEPA, 1983a).

Information gathered during the 1983 OEPA inspection indicated that the facility was treating resin wastes by allowing the resins to harden. An OEPA follow-up inspection concluded that the facility was not treating the waste since the resin was self-hardening. Sancap Abrasives had also substituted a water-based nonignitable solvent for the toluene-based adhesive, further reducing the quantity of hazardous waste generated by the facility (OEPA, 1983b).

The facility is required to have operating air permits. Sancap Abrasives has an air discharge permit for the 80-inch paper and cloth coating line. This permit expires November 7, 1994. The facility also operated a 45-inch coating line under an air discharge permit. Sancap Abrasives allowed this permit to expire because the 45-inch coating line is currently being rebuilt. The facility has not violated its air discharge permit. The facility has no history of odor complaints from area residents.

The Sancap Abrasive facility discharges wastewater from the Wastewater Pretreatment Unit (SWMU 5) under City of Alliance Permit Number 216-A. This permit is valid from March 1992 to June 1, 1993. The facility is required to monitor for the following parameters: flow; pH; biological oxygen demand; chemical oxygen demand; total nonfilterable solids; mercury; phenol; and zinc.

Sancap Abrasives discharges noncontact cooling water and storm water to an unnamed tributary of the Mahoning River by way of a roadside ditch under National Pollutant Discharge Elimination System (NPDES) permit number OH0063576. These discharges are monitored for flow rate, pH, and oil and grease (OEPA, 1992b). During the PA, PRC found no notices of violation issued for this permit.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

Because the facility building is located in Stark County, Ohio, climatic data for Stark county is presented. The climate in Stark County is continental. The average daily temperature is 60.0 degrees Fahrenheit (°F). The lowest average daily temperature is 20.7 °F in February. The highest average daily temperature is 83.2 °F in July (USDA, 1971).

The total annual precipitation for the county is 36.43 inches (USDA, 1971). The mean annual lake evaporation for the area is about 31 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is about 2.25 inches (USDC, 1963).

The prevailing wind is from the south. Average wind speed is about 10 miles per hour. The average wind speed is slightly stronger in winter than summer (USDA, 1971).

2.6.2 Flood Plain and Surface Water

The Sancap Abrasives facility is not located in a 100-year flood plain (FEMA, 1983).

The nearest body of surface water is the Mahoning River which is located 1 mile west of the facility. The Mahoning River discharges to the Beaver River, which discharges to the Ohio River. Other bodies of surface water in the area include Berlin Lake, about three miles northwest of the facility, and the Deer Creek Reservoir, which is located three miles northwest of the facility. The City of Alliance uses the Deer Creek Reservoir as a source of municipal water.

Storm water from the facility flows from the NPDES-permitted outfall into a ditch which discharges into an unnamed tributary of the Mahoning River.

2.6.3 Geology and Soils

Soils at the facility are classified as (1) Wadsworth silt loam and (2) Remsen silt loam. The Wadsworth silt loam is typically a grayish-brown silt loam from a depth of 0 to 7 inches; a brownish-yellow silty clay loam from 7 to 12 inches; a brown, silty clay loam from 12 to 20 inches; and a mottled-brown, clay loam fragipan from 20 to 31 inches. Below the fragipan is a brown clay loam that extends to a depth of 48 inches. This soil overlies a calcareous soil material that extends to 60 inches. The Remsen silt loam is typically a dark grayish-brown silt loam from a depth of 0 to 7 inches and a mottled-brown, silty clay loam from 7 to 29 inches. At approximately 36 inches, there is a dark, yellow-brown layer 10 inches thick that overlies a yellowish-brown silty clay glacial till. The permeability of the subsoil and glacial till is very low; therefore, they have a high seasonal water table. The depth to calcareous soil material ranges from 28 to 46 inches (Lancy, 1989).

Both the Wadsworth and Remsen soils typically contain high percentages of silt and clay and have low permeabilities. The Wadsworth, which contains 70 to 90 percent silt and clay, contains intervals having permeabilities as low as 0.063 to 0.2 inch per hour or 0.5 to 17×10^{-3} centimeters per second (cm/sec). The Remsen, which typically contains 90 to 95 percent silt and clay, contains intervals having permeabilities as low as 0.063 inch per hour or 0.5×10^{-3} cm/sec. According to Lancy, the soils in the Settling Lagoons (SWMU 3) may have acted as a natural liner for the lagoons because of their textural and permeability characteristics (Lancy, 1989).

Glacial till that was deposited during Wisconsinan glaciation underlies the soil intervals in the site area. The shallowest glacial deposit in the area is the Hiram Till, which is a thin (less than 2 feet thick) clay with very little sand or gravel. At the Sancap Abrasive facility, the

Lavery till may also be present beneath the Hiram Till. The thickness of the till beneath the facility is unknown. Generally, till thickness increases dramatically toward the Mahoning River Valley, which is located west of the facility. In Stark County, where till deposits contain thick permeable sand and gravel, high ground water yields have been recorded (Lancy, 1989).

Pennsylvanian-age Pottsville Group rocks consisting of coals, shales, sandstones, and thin limestones occur beneath the glacial till. The bedrock surface dips gently to the southwest (Lancy, 1989).

Site specific soil borings were conducted during a ground-water investigation of the Settling Lagoons (SWMU 3). The interval penetrated during the boring program consists of a dense, very firm, clay-dominated glacial till that was deposited during the Wisconsin glacialation. This till, encountered at depths of 33 to 43 feet below grade, also contains traces of coarse-grained sand and very fine gravel, and is calcareous in several places (Lancy, 1989).

At the upgradient well location, the clay-rich till grades to a silty, very fine-grained sand interval at 42 feet. At all downgradient well locations, the sand and gravel content of the till increases significantly at depths ranging from 33 to 43 feet below grade (Lancy, 1989).

2.6.4 Ground Water

All water-bearing zones encountered during well installation and monitoring, except for one, were found below the base of the clay-rich till. The exception is a small perched zone found at a depth of 16 to 18 feet in Monitoring Well 1. Upon penetration, this zone yielded only very small amounts of water. The intergranular permeability of the clay-rich till is expected to be on the order of 10^{-3} feet per day (10^3 cm/sec) or less. Permeability of the deeper, coarser-grained intervals encountered below the base of the clay till should be considerably higher than that of the till. Water encountered in these intervals is under confined pressure, and it typically rises 10 feet or more above the top of the water bearing formation. Ground-water depths in the region typically vary from 22 to 25 feet below ground surface. Ground water flow direction is generally to the southwest. The hydraulic gradient of the confined zones is approximately 0.01 foot per foot (Lancy, 1989).

Ground water in the area is used as a private drinking water source. The nearest downgradient drinking water well is located 500 feet southwest of the facility (Lancy, 1989).

The facility occupies 280 acres in a mixed-use, residential and agricultural area in Alliance, Ohio. Alliance has a population of about 20,000. The facility is bordered on the north by a wooded area and strip mines, and on the west, south, and east by residences. The nearest residence is located about 100 feet south of the facility. Facility access is partially restricted by a 6-foot fence along the southern and western sides of the facility. There is no fence along the eastern and northern sides of the facility.

The nearest body of surface water is the Mahoning River which is located 0.5 mile west of the facility and is used for surface runoff. Surface water flows from the Mahoning River to the Beaver River, and then to the Ohio River. The Deer Creek Reservoir, which is located about 3 miles northwest of the facility, is used as a source of municipal drinking water for the City of Alliance.

Ground water in the area is used as a private drinking water supply. The nearest drinking water well is located 500 feet upgradient of the facility. The facility has installed four ground-water monitoring wells on site as part of the closure of the Settling Lagoons (SWMU 3) (Lancy, 1989).

No sensitive environments are located on site. The nearest sensitive environment, located 2,000 feet northwest of the facility, is a permanent palustrine open water system that is permanently exposed (USDI, 1976).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the nine SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former Regulated Hazardous Waste Storage Area

Unit Description:

This unit consists of a 60-foot by 50-foot area on the eastern part of the Chemical Product Storage Building. The unit has a concrete floor and no floor drains were located in the area. This unit used to store 55-gallon drums containing waste MEK. This unit is currently used to store nonhazardous hardened resins in open 55-gallon drums (see Photograph No. 1).

Date of Startup:

This unit began operations in 1980.

Date of Closure:

OEPA approved withdrawal of the Part A permit application on November 14, 1983. This unit currently manages nonhazardous hardened resin.

Wastes Managed:

This unit used to store waste MEK (F005). It currently stores drums of nonhazardous hardened resin.

Release Controls:

The drums are stored indoors on a concrete floor.

**History of
Documented Releases:**

There have been no documented releases from this unit.

Observations:

PRC observed approximately 120 drums of hardened resin stored in the area in open 55-gallon steel drums. According to facility representatives, this hardened resin had been left by SIA before the facility was sold to Robert Stuhlmiller in 1992. PRC did not note any signs of spills, leaks or solvent odor at the time of the VSI.

SWMU 2**Current Hazardous Waste Accumulation Area****Unit Description:**

This unit consists of a 10-foot by 10-foot area in the western portion of the Chemical Product Storage Building. This unit was used to accumulate 55-gallon drums of waste MEK (F005) for less than 90 days. The waste was stored indoors on a concrete floor. The unit is equipped with a ventilation system to prevent the buildup of flammable vapors (see Photograph No. 2).

Date of Startup:

This unit began operations around 1983.

Date of Closure:

This unit has been inactive since around 1985 or 1986. Sancap Abrasives and Sancap Liner stated they recycle all waste on site and no longer use the area for waste accumulation.

Wastes Managed:

This unit managed waste MEK (F005).

Release Controls:

Waste was stored indoors on a concrete floor.

**History of
Documented Releases:**

There have been no documented releases from this unit.

Observations:

PRC observed no hazardous waste being accumulated at the unit at the time of the VSI. PRC observed oil-type stains throughout the building and in the waste storage area. Numerous product drums were stored throughout the building.

SWMU 3**Settling Lagoons****Unit Description:**

This unit consists of four lagoons: (1) Lagoon 1 - 140 by 130 by 4 feet; (2) Lagoon 2 - 170 by 120 by 4 feet; (3) Lagoon 3 - 140 by 140 by 3 feet; (4) Lagoon 4 - 120 by 120 by 3 feet. The unlined lagoons were all dug by SIA into native soil. SIA discharged wastewater from equipment cleanups into a series of settling lagoons. The wastewater was initially discharged to Lagoon 1. The wastewater was then discharged along with wastewater from Lagoon 3 into Lagoon 2. The combined wastewaters from Lagoon

2 were then discharged to the City of Alliance sanitary sewer system. According to facility representatives, Lagoon 4 was used to provide soil for berm construction, but was occasionally used as a source of dilution water (see Photographs No. 3, 4, 5, and 6).

Date of Startup: The unit began operation in 1977.

Date of Closure: Sancap Abrasives stopped using this unit in 1987. Sancap Abrasives is currently conducting a non-RCRA closure of this unit under guidance from OEPA.

Wastes Managed: This unit managed wastewater from the cleaning of the abrasive coating line. The wastewater was then discharged to the City of Alliance sewer system under the facility's wastewater discharge permit.

Release Controls: No release controls were located at this unit.

History of Documented Releases: Wastewater from the abrasives coating line cleanup was discharged to the unlined lagoons from 1977 to 1987. Sampling and analyses of lagoon sediment and water conducted in 1988 indicated that Lagoons 1 and 2 exhibited the greatest impact. Both ground-water and sediment from these lagoons had elevated concentrations of phenol, total organic carbon, and barium. Hazardous waste determinations of the sediments in the lagoons indicated that the sediments were not ignitable, corrosive, or extraction procedure toxic. Lagoons 3 and 4 had elevated sulfide reactivity levels, which were attributed to natural swamplike conditions. See Section 2.4 for additional information.

Observations: PRC observed water in the lagoons at the time of the VSI. According to facility representatives, this water consisted of rainwater and the high ground water in the area. PRC observed that there were no active pumping operations at the time of the VSI. The former pumphouse and associated piping were rusted and in disrepair.

SWMU 4**Wastewater Sumps****Unit Description:**

This unit consists of three outdoor, underground, lined, concrete sumps: east, west, and central. The east and west sumps gravity-feed into the central sump. The sumps have the following dimensions (length by width by height): west, 15 by 10 by 5.5 feet; central, 12 by 6 by 10 feet; east, 15 by 10 by 6.5 feet (see Photographs No. 7, 8, and 9). Wastewater is pumped from the central sump to the Wastewater Pretreatment Unit (SWMU 5). Until 1988, the wastewater was pumped from the Wastewater Sumps to the Settling Lagoons (SWMU 3).

Date of Startup:

This unit began operations in 1977.

Date of Closure:

This unit is currently active.

Wastes Managed:

This unit manages wastewater from the cleaning of the abrasive coating line. The wastewater is pumped from the wastewater sumps to the Wastewater Pretreatment Unit (SWMU 5).

Release Controls:

The sumps are lined with an impervious liner.

**History of
Documented Releases:**

There have been no documented releases from this unit.

Observations:

PRC observed soapy water in the wastewater sump during the VSI. PRC did not note any solvent odors near this unit. PRC did not note any indications of release at this unit.

SWMU 5**Wastewater Pretreatment Unit.****Unit Description:**

This unit consists of a 1,500-gallon, aboveground fiberglass tank used to monitor and control pH of the wastewater from SWMU 4. The tank is located in a dedicated room near the southwest corner of the facility. It sits on four steel legs over a concrete floor. Sulfuric acid is used to maintain the pH of the discharge between 6 and 10. No drains are located near this unit (see Photograph No. 10).

Date of Startup: This unit began operations in 1988.

Date of Closure: This unit is currently active.

Wastes Managed: This unit manages wastewater from the abrasive coating line cleanup. The water is then discharged to the City of Alliance sewer system under the facility's wastewater discharge permit, City of Alliance Permit Number 216-A.

Release Controls: The tank is located indoors, in a dedicated room that has a concrete floor.

History of Documented Releases: There have been no documented releases from this unit.

Observations: PRC observed that there was some white crystalline staining on the floor around the unit. The staining was superficial and probably caused by a salt. PRC did not observe any indications of liquid spills at the unit.

SWMU 6

Abrasive Roll-Off Box

Unit Description: This unit consists of a 40-cubic-yard steel roll-off box. The Abrasive Roll-Off Box manages waste trim from Sancap Abrasives and trash. The roll-off box is located outdoors, on a concrete pad. (see Photograph No. 11).

Date of Startup: This unit began operations about 1985.

Date of Closure: This unit is currently active.

Wastes Managed: The Abrasive Roll-Off Box manages trim from Sancap Abrasives and trash. The Roll-Off Box is emptied twice per week and is transported by Max Disposal to its transfer facility in Alliance, Ohio. The waste is then landfilled at one of the following landfills: G & G Landfill in Carrollton, Ohio; American Landfill in Malvern, Ohio; and Kimbell Landfill in Dover, Ohio.

Release Controls:	The unit is covered but has an opening into the building to facilitate loading of waste. The unit is located on a concrete pad.
History of Documented Releases:	There have been no documented releases from this unit.
Observations:	PRC did not observe any signs of spills or leaks at this unit.
SWMU 7	Still
Unit Description:	This unit consists of a steel still, located indoors, on a concrete floor. The still is about 2 by 2 by 3.5 feet in size. The unit is used to recover methylene chloride (F002) used to clean equipment and drip pans from Sancap Liner. The still has a capacity of 15 gallons when operated for 8 to 10 hours (see Photograph No. 12).
Date of Startup:	This unit began operations around 1985 or 1986.
Date of Closure:	This unit is currently active.
Wastes Managed:	This unit manages waste methylene chloride (F002) used to clean equipment. The methylene chloride still bottoms (F002) from this unit are disposed of in the Liner Roll-Off Box (SWMU 9).
Release Controls:	The unit is located indoors on a concrete floor.
History of Documented Releases:	There have been no documented releases from this unit.
Observations:	PRC did not observe any signs of spills or leakage at this unit. PRC did not observe any drains near this unit.
SWMU 8	Used Oil Storage Drum
Unit Description:	This unit consists of a 55-gallon steel drum located inside on a concrete floor. This drum is used to accumulate used oil from equipment that is maintained by QRM (see Photograph No. 13).

Date of Startup: This unit began operations in February 1992.

Date of Closure: This unit is currently active.

Wastes Managed: This unit manages waste oils that were generated by QRM during equipment maintenance. The waste oil is then taken to the Safety-Kleen facility in Cleveland, Ohio.

Release Controls: This unit is located indoors on a concrete floor. The drum is stored closed, with a covered funnel, unless waste is being added.

History of Documented Releases: There have been no documented releases from this unit.

Observations: PRC did not observe any signs of spills or leakage at this unit. One drum was on site at the time of the VSI.

SWMU 9

Liner Roll-Off Box

Unit Description: This unit consists of a 40-cubic-yard roll-off box. The Liner Roll-Off Box manages waste trim from Sancap Liner. According to the Sancap Liner facility representative, when the Still (SWMU 7) is cleaned (about once a year), the methylene chloride still bottoms (F002) are thrown into the Liner Roll-Off Box for disposal. The Liner Roll-Off box is located outdoors, on a concrete pad in a covered area (see Photograph No. 14).

Date of Startup: This unit began operations around 1985.

Date of Closure: This unit is currently active.

Wastes Managed: The Liner Roll-Off Box manages trim and methylene chloride still bottoms (F002) from Sancap Liner. The Liner Roll-Off Box is emptied twice per week and its contents are transported by Max Disposal to their transfer facility in Alliance, Ohio. The waste is landfilled at one of the following landfills: G & G Landfill in

Carrollton, Ohio; American Landfill in Malvern, Ohio; and Kimbell Landfill in Dover, Ohio.

Release Controls:

The unit is covered on the top but has an opening into the building to facilitate loading of waste. The unit is located on a concrete pad.

**History of
Documented Releases:**

There have been no documented releases from this unit.

Observations:

PRC did not observe any signs of spills or leakage at this unit.
PRC did not observe methylene chloride still bottoms (F002) in the unit at the time of the VSI.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified nine SWMUs and no AOCs at the Sancap Abrasives facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1

Former Regulated Hazardous Waste Storage Area

Conclusions:

This unit consists of a 60-foot by 50-foot area on the eastern part of the Chemical Product Storage Building. This unit formerly stored 55-gallon drums of waste MEK for greater than 90 days. OEPA approved withdrawal of the Part A permit application for this unit on November 14, 1983. No sampling activities were required as part of this closure. This unit currently stores 55-gallon open-head steel drums containing hardened resin. There have been no documented releases from this unit. The resins are mixed as part of the abrasive coating process and the mixture subsequently hardens. Therefore, no waste treatment process occurs at this unit. As the material cures, the drums are kept covered. At the time of the PA/VSI, the resins had cured, and PRC did not notice any free materials to be present. The potential for releases to ground water, surface water, air, and on-site soils is low.

Recommendations:

PRC recommends the facility arrange for proper disposal of the drums containing hardened resin on site.

SWMU 2

Current Hazardous Waste Accumulation Area

Conclusions:

This unit consists of a 10-foot by 10-foot area on the western side of the Chemical Product Storage Building. Until 1985 or 1986, waste MEK (F005) was accumulated in 55-gallon drums in the unit. The drums were stored indoors on a concrete floor. Sancap Abrasives and Sancap Liner stated that since all hazardous waste is recycled on site, the hazardous waste storage area is no longer used. The building contains numerous

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product drums used by both Sancap Abrasives and Sancap Liner. PRC observed oil-type stains throughout the building. The room has a powered ventilation system to prevent the buildup of flammable vapors. The potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 3

Settling Lagoons

Conclusions: SIA discharged wastewater from equipment cleanups into a series of unlined settling lagoons. The wastewater was initially discharged to the receiving lagoon (Lagoon 1). The wastewater was then discharged along with wastewater from the rain collection lagoon (Lagoon 3) into the discharge lagoon (Lagoon 2). The wastewater from the discharge lagoon was then discharged to the City of Alliance sanitary sewer system. A fourth lagoon (Lagoon 4) was also present, but was only used occasionally to provide soil for berm construction and dilution water. Sancap Abrasives is currently proceeding with non-RCRA closure of this unit.

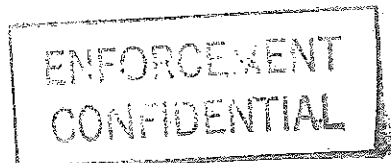
Ground Water: Low. Sancap stopped using the Settling Lagoons in 1987. Ground-water sampling downgradient of the Settling Lagoons did not indicate elevated concentrations of constituents found in the Settling Lagoon sediment. The soil in the area has low permeability to prevent release to ground water and surface water.

Surface Water: Low. Sancap stopped using the Settling Lagoons in 1987. All the lagoons are bermed to prevent overflow. The soil in the area has low permeability to prevent release to ground water and surface water.

Air: Low. The wastes managed in the Settling Lagoons consisted of constituents dissolved in an aqueous solution. These contaminants would not have a high vapor pressure or potential to release to the air.

On-Site Soils: A release to on-site soils has occurred from this unit. Soil sampling and analyses by Lancy of lagoon sediment and water was conducted in 1988, which indicated that the receiving and discharge lagoons (Lagoons 1 and 2) contained elevated concentrations of phenol,

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total organic carbon, and barium. Lancy concluded that these were caused by residual wastes. Elevated levels of sulfide found in the dilution lagoons were attributed to natural swamplike conditions at the unit.

Recommendations: PRC recommends the facility continue with closure proceedings under the OEPA guidance.

SWMU 4 Wastewater Sumps

Conclusions: This unit consists of three outdoor, underground, lined, concrete sumps that are used to collect wastewater from cleanups of the abrasive coating line. The wastewater is gravity-fed to a lined underground concrete central sump. From 1977 to 1988, this wastewater was pumped to the Settling Lagoons (SWMU 3). From 1988 to the present, this wastewater has been discharged to the Wastewater Pretreatment Unit (SWMU 5). The sumps are lined to prevent releases to ground water and on-site soils. The sumps are covered to prevent releases to the air. Discharge is below ground level to prevent direct discharges to surface water. The potential for release to ground water, surface water, air, and on-site soils for this unit is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 5 Wastewater Pretreatment Unit

Conclusions: This unit consists of a 1,500-gallon aboveground fiberglass tank that is located indoors above a concrete floor. Wastewater from the center sump (SWMU 4) is pumped to the unit where the pH adjustment, if necessary, to meet the facility's discharge limit of 6 to 10. The Sancap Abrasive facility discharges wastewater from the Wastewater Pretreatment Unit (SWMU 5) under City of Alliance Permit Number 216-A. The tank is located aboveground, so leaks from the tanks would be detected. The tank is located in a dedicated concrete room with a concrete floor to manage potential leaks. The potential for release to ground water, surface water, air, and on-site soils is low for this unit.

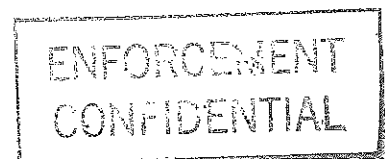
Recommendations: PRC recommends no further action for this unit.

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SWMU 6**Abrasive Roll-Off Box****Conclusions:**

This unit consists of a 40-cubic-yard Abrasive Roll-Off Box. The box manages trim from converting operations from Sancap Abrasives. The abrasive waste is inert and nonliquid. The box is located outdoors, is covered, and sits on a concrete pad. The potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations:

PRC recommends no further action for this unit.

SWMU 7**Still****Conclusions:**

This unit is located indoors on a concrete floor. The Still is used to recover waste methylene chloride (F002) from spent material generated during machine cleaning. The Still is located indoors on a concrete floor. Waste solvents are managed in 15-gallon quantities. The facility currently disposes of the still bottoms from this unit by putting them in the Liner Roll-Off Box (SWMU 9). The potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations:

PRC recommends the facility manage and accumulate the waste methylene chloride still bottoms (F002) from this unit as a hazardous waste.

SWMU 8**Used Oil Storage Drum****Conclusions:**

This unit manages used oil from QRM in a closed, 55-gallon drum that is located indoors on a concrete floor. Waste is managed in less than 55-gallon quantities. The drum is kept closed when waste is not being added. The potential for release from this unit to ground water surface water, air, and on-site soils is low.

Recommendations:

PRC recommends no further action for this unit.

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SWMU 9**Liner Roll-Off Box****Conclusions:**

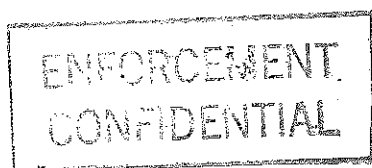
This unit consists of a 40-cubic-yard roll-off box. The Liner Roll-Off Box is located outdoors on a concrete pad and is covered. The Liner Roll-

Off Box manages waste trim from Sancap Liner. According to the Sancap Liner facility representative, when the Still (SWMU 7) is cleaned about once a year and the methylene chloride still bottoms (F002) are thrown into the Liner Roll-Off Box for disposal. The Liner Roll-Off Box is emptied twice per week and its contents are transported by Max Disposal to their transfer facility in Alliance, Ohio. The waste is landfilled at one of the following landfills: G & G Landfill in Carrollton, Ohio; American Landfill in Malvern, Ohio; and Kimbell Landfill in Dover, Ohio. The methylene chloride still bottoms (F002) are not properly managed as hazardous waste. The potential for release to ground water, surface water, and on-site soils is low.

Air: Moderate to high. Methylene chloride still bottoms (F002) are disposed of into SWMU 9. Any entrained liquid could be volatilized and released because SWMU 9 is not sealed.

Recommendations: The facility should manage and dispose of the methylene chloride still bottoms (F002) as a hazardous waste.

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TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former Regulated Hazardous Waste Storage Area	1980 to 1983	None	Facility should arrange for proper disposal of hardened resin drums.
2. Current Hazardous Waste Accumulation Area	1983 to 1985 or 1986	None	No further action
3. Settling Lagoons	1977 to 1987	Soil sampling of lagoon sediment indicated elevated concentrations of phenol, total organic carbon, and barium.	Facility should continue with closure activities
4. Wastewater Sumps	1977 to present	None	No further action
5. Wastewater Pretreatment Unit	1988 to present	None	No further action
6. Abrasive Roll-Off Box	1985 to present	None	No further action
7. Still	1985 or 1986 to present	None	Facility should manage and accumulate methylene chloride still bottoms (F002) as a hazardous waste
8. Used Oil Storage Drum	1992 to present	None	No further action
9. Liner Roll-Off Box	1985 to present	Potential release to air	Facility should manage and dispose of methylene chloride still bottoms (F002) as a hazardous waste

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REFERENCES

- Lancy Environmental Services Company, 1989. Site Evaluation Report for Wastewater Treatment Lagoon Site, SIA America, Inc., March.
- Ohio Environmental Protection Agency (OEPA), 1981. Letter from Paul Flanigan, Hazardous Waste Materials Management, to Ronald Kron, Sancap Abrasives, Inc. (Sancap Abrasives), August 24.
- OEPA, 1983a. Letter from Rodney Beals, Environmental Scientist, to Ronald Kron, Sancap Abrasives, Inc., April 8.
- OEPA, 1983b. Letter from Rodney Beals, Environmental Scientist, regarding follow-up inspection, to Ronald Kron, Sancap Abrasives, June 21.
- OEPA, 1983c. Letter from Philbin Scott, Technical Advisor, Hazardous Waste Permit Board, to R. Goeldi, Sancap Abrasives, November 14.
- OEPA, 1992a. Permit to Install Wastewater Lagoon Closure, May 21.
- OEPA, 1992b. OEPA Briefing Memo, Basis for Development of National Pollutant Discharge Elimination System Permit, Sancap Abrasives, May 27.
- PRC, 1992. Telephone Conversation between Paul Schlabig of Sancap Liner, Inc., and Cathy M. Collins, PRC, December 16.
- Sancap Abrasives, 1980a. Notification of Hazardous Waste Activity, August 13.
- Sancap Abrasives, 1980b. Part A Permit Application, November 18.
- Sancap Abrasives, 1982. Letter from R. Goeldi, Vice President Requesting Withdrawal of Part A Permit Application to Kathy Haner, Environmental Protection Agency (EPA), February 8.
- U.S. Department of Agriculture, 1971. Soil Survey of Stark County Ohio, October.
- U.S. Department of Commerce (USDC), 1963. Rainfall Frequency Atlas of the United States.
- USDC, 1968. Climatic Atlas of the United States.
- U.S. Department of the Interior, 1976. National Wetlands Inventory, Alliance Ohio, April.
- U.S. Environmental Protection Agency, 1983. Letter from Basil G. Constantelos, Waste Management Division, to R. Goeldi, Vice President, Sancap Abrasives, February 8.
- U.S. Federal Emergency Management Agency (FEMA), 1983. Flood Insurance Map for Stark County, September 1.
- U.S. Geological Survey (USGS), 1978. Alliance Ohio Quadrangle 7.5-minute Series.

ATTACHMENT A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Sancap Abrasives, Inc. (Sancap Abrasives)
16123 Armour Street
Alliance, Ohio 44601
OHD 093 289 700

Date: October 27, 1992

Primary Facility Representative: Gail Kittleson, Operations Manager, Sancap Abrasives
Representative Telephone No.: (800) 433-6663

Additional Facility Representatives: Robert Stuhlmiller, President, Sancap Abrasives and Sancap Liner, Inc.

Inspection Team: Cathy M. Collins, PRC Environmental Management, Inc.
(PRC)
Hans Upadhyay, PRC

Photographer: Cathy M. Collins

Weather Conditions: Foggy, calm, 50 °F

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 10:45 a.m. PRC inspected the following areas: Former Regulated Hazardous Waste Storage Area (SWMU 1); Current Hazardous Waste Accumulation Area (SWMU 2); Settling Lagoons (SWMU 3); Wastewater Sumps (SWMU 4); Wastewater Pretreatment Unit (SWMU 5); Abrasive Roll-Off Box (SWMU 6); Still (SWMU 7); Used Oil Storage Drum (SWMU 8); and Liner Roll-Off Box (SWMU 9).

The tour concluded at 12:45 p.m., after which the inspection team held an exit meeting with the facility representatives. The VSI was completed and the inspection team left the facility at 1:30 p.m.



Photograph No. 1

Orientation: West

Description: Former Regulated Hazardous Waste Storage Area; this shows about 120 55-gallon drums of waste hardened resin left by SIA

Location: SWMU 1

Date: 10/27/92



Photograph No. 2

Orientation: East

Description: Current Hazardous Waste Accumulation Area; no hazardous waste on site; note oil-type stains from product storage which takes place in this building

Location: SWMU 2

Date: 10/27/92



Photograph No. 3

Orientation: East

Description: Settling Lagoon; receiving lagoon (Lagoon 1)

Location: SWMU 3

Date: 10/27/92



Photograph No. 4

Orientation: Northwest

Description: Settling Lagoon; discharge lagoon (Lagoon 2)

Location: SWMU 3

Date: 10/27/92



Photograph No. 5
 Orientation: Southwest
 Description: Settling Lagoon; rain water collection lagoon (Lagoon 3)

Location: SWMU 3
 Date: 10/27/92



Photograph No. 6
 Orientation: East
 Description: Settling Lagoon; this lagoon was a source of soil for berm construction and was occasionally used for dilution water (Lagoon 4)

Location: SWMU 3
 Date: 10/27/92



Photograph No. 7
 Orientation: Southeast
 Description: Wastewater Sumps; west sump

Location: SWMU 4
 Date: 10/27/92



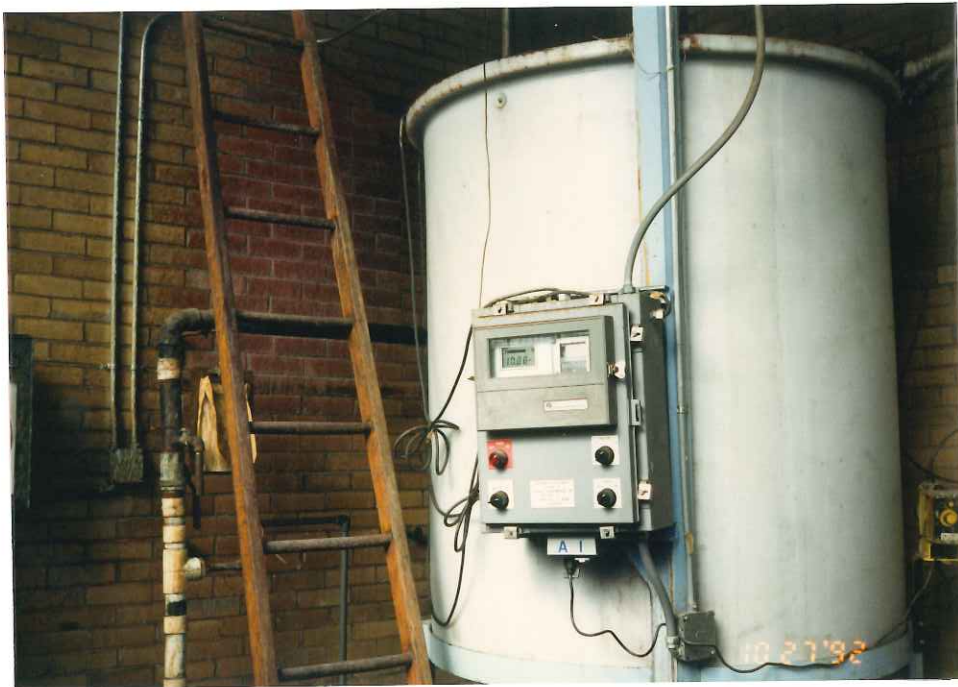
Photograph No. 8
 Orientation: East
 Description: Wastewater Sumps; center sump

Location: SWMU 4
 Date: 10/27/92



Photograph No. 9
 Orientation: West
 Description: Wastewater Sumps; wastewater in west sump

Location: SWMU 4
 Date: 10/27/92



Photograph No. 10
 Orientation: Northwest
 Description: Wastewater Pretreatment Unit; fiberglass tank above a concrete floor

Location: SWMU 5
 Date: 10/27/92



Photograph No. 11

Orientation: Southeast

Description: Abrasive Roll-Off Box; covered box located on a concrete pad

Location: SWMU 6

Date: 10/27/92



Photograph No. 12

Orientation: North

Description: Still; the still is the blue box on a concrete floor; containers and drums in the area store product

Location: SWMU 7

Date: 10/27/92



Photograph No. 13
 Orientation: North
 Description: Used Oil Storage Drum; 55-gallon drum on a concrete floor

Location: SWMU 8
 Date: 10/27/92



Photograph No. 14
 Orientation: West
 Description: Liner Roll-Off Box; covered box on a concrete pad

Location: SWMU 9
 Date: 10/27/92

ATTACHMENT B
VISUAL SITE INSPECTION FIELD NOTES

①

SANCAP AEFASIVE

ALLIANCE, OH.

QHRD 093 289 700

OCTOBER 27, 1992

8:30 A.M.

MR. GRAY KITTLESON, CP

MR. BOB STUMMICKER,

OWNER

Taglin Craft

ORIGINALLY

1948

ARMOUR -

Grayson

operated it

solid facing in

mid 60's

Grayson

Azko

operated at

ARMAR

②

Armal abrasive

1978 SIA (Swiss)

remained the company

Sancap, Delancey Co

1986 A was to

SIA America

Liner food liner

did not become SIA

became

1988 SIA sold

Sancap Liner technology

to Stahlwille

1992 SIA sold

abrasive to Feb

Stahlwille

2/4/92 Sancap

Abrasive -

(3)

Arrows got involved in glue because they had an excess of animal parts.

Formerly the site was an airplane factory upholstering operations, cut into boards, made abrasives from animal parts.

They have a hog hair pits

got involved in Facility

Manufactures

Corded abrasives Paper, Cloth

use phenolic

resins, used to make resins

coat & dry in oven

cut into boards, sheets, etc.

Solid

Waste

run from

abrasives go to landfill

largest

(4)

(5)

hardened Resins -
drums of
solid waste
to

Liquids go to
settling tank
to waste water
treatment facility
(pH treatment)

Employees - 110
in direct production
Excluding Supervisors: Oil
625,000 ft² Diked
including liner
79,000 ft²
including liner

(6)

280 acres
- total in property

Underground
Storage Tanks

were removed in
the early 80's
They had produced
inventory and
presumably testing of
the USTs before
they were removed

AST
Diked

⑦

Permits

Facility operates under NTPDES permit & controlled two are monitored 04 00 635 76

AIR PERMITS Discharge Permit for Coating lines They had two but one is not operational

O&PA Per mit to Operate and Contaminant Source

⑧

Effective

11/8/91 TO 11/7/94

They have a BO - 45 in operation

Application

15 76 00 0070 K 001

Some "Boilers" are actually GAS-FIRED FURNACES

Facility is Probably conditionally exempted small quantity generator

(9)

City of
Alliance
Water
Permit
for
+ Abrasive
Permit # 216-A
+ MAF 92-
+ June 1 93
Meter for
flow, P 116-10
BOD, COD
T. MFT Residual
Mercury, T
Phenol
Zinc,

(10)

TRM Water
to Com-pactor
MAX. DISPOSE
WASTE and FILL
at BFI in
Willow CREEK
Scrap Resin is
manifested +
sent to
Permitted landfill
Alliance OHIO 20,25,000
people
Facility is located
in Lexington
Township

(11)

Facility, Resources, Four Shipments
 DW from off site
 Alliance which (2) 61 drums
 gets it from per shipment
 Deer Creek Reservoir each drum
 Surface Runoff Mahoney apiece 5-600 lb
 flows to Mahoney Handed Drum me
 -co Berlin Reservoir Rain Drums
 Envirco Transportation Facility is partially
 Inc. Drums fenced
 go for American No East West
 Landfill Inc. Female
 in Waynesburg No North South
 O #10 Fence

Drums 500-600 lb South Webb & Arnold
 Drum One House

(12)

(13)

~500' across
the street

Primarily a wooded
Area
North east has a
farm

Drinking
wells on
Street

mainly
Well

The facility property
is both in
Mahoning
and Stark
counties

(14)

Side is
all F/A approved
since food applications

Facility says they
have no

Solid Waste
Max Disposal

40 C.Y.
Primarily from
paper
stock

Solvent used to
clean up mixer,
they reuse solvent
Solvents clean

1 (15)

coating parts
1) 1 trichloroethane
methylene
chloride

Reuse Solvents
in site

Facility
1045

Primary
AREA

General

Drive Batts, Dissep
Sheds

Four

M and factory

Trim White

1) 1 trichloroethane

Belt Production
Splice Together
& Shred into
narrower sizes

at different size
Disk and Shreds
Considered Converting
Operation

Waste Treatment
Tank is in
Warehouse

(17)

Waste water
Treatment Tank
Maintains pH
keep between
6 and 12

2,000 liter (500 gal)
fiberglass tank

10 Drainage
Tank -
above ground
& discharged
to sanitary
sewer

operated since
86-87 NW
2 photos
Some white
or ground
probably
a deposit

(18)

On Concrete
Floor

11 Doors Run

by 20
Sulfuric acid. is

used - to maintain
pH

Coating
Bringing Machine
Paper

or Cloth on
Coating
Roll where grain

is deposited
electrostatically

gets through men
after another layer

of adhesive is
deposited 80%
to are not the grain

(19)

the ^{one} product
then goes thru
another oven

liquid washing any
water goes
into settling
tanks

Lined tank
2 side tanks

2 photo
wastewater
sumps with
lined with
impervious liner

began operation
from 1967

(20)

to lagoons
Stopped using
lagoon in 1966
to 1967

These sumps
gravity feed into
Cinder can (sump)
Photo Middle
Cinder Tank
Concreting
Man hole in

Center
Water is pumped
to treatment
plant is
controlled by pH
meter

Observation appeared
to be supply the

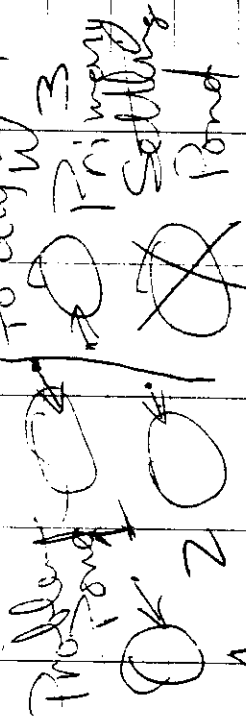
(21)

4/9 Chemical
Globe

Monitoring have
wells been installed
around here

Pond - S

Excavation on
to city W 3



4
N
We
Not There

2 3 were active
probably and

(22)

Unlined settling
Pond

Approximately
70 by 70

Photo Orient E

Shows horse
loading to
Pond

Pipe line leading
from chemical
Pond to C.I.T.P.
100 by 150 feet
accumulator
rainwater

Water
Spring

(23)

Photo North
by 75
the
may be

Water. Come
here. 1st of
went to pond
northwest

Photo West
two
Ponds were
used. Actually,
depressions
caused by digging
barns for the
other two ponds

(24)

Photo 9 East
Ponds. Digging
not used
Depression
caused by excavation
About 100 ft. by
50 ft. wide
by Water & foliage
No sign of
Active Discharge
Pumps Piping
etc.
All piping in
the area looks
in disrepair

(25)

AS + Oil
Storage no longer
used - 1972

Boiler supply
heat bottles
at plant heat
supply system for heating

Major Coating
line has the
gun gas fired
boilers

2nd coating
no permit
being rebuilt

(26)

Hardened Resin
Drum storage
Area Concrete
shed
No Floor drains
Concrete floor by 50'
about 60' by 50'
Photos West
About 4 TO S
DEEP 14 S
acres by 1/3
two high
120 drums
look solidified
(cured) No
Chemical odor
This was generated
by the people
before the

(27)

Date of Operation
Start unknown
before '88
They stopped having
a regular disposal
time frame

He will want
sample analysis
Results

Former Permitted
Current: H.C.M.
Product Storage
Area
Floor

TYPE Stone
on floor

(28)

Concrete was
put in place in
seams

Product Drums
are stored on
pallets on
the ground
Concrete block
building is about
100' by 60'

Solvent Waste AREA
is 10' by 10'
No Drums are
currently stored
on site

(29)

Product In
 Ethyl Acetate
 IPA MeOH
 Furfuryl Alcohol
 Aluminum Chloride
 MEK
 Antine Resin
 Solution
 Photo OF
 Drum Storage
 Orient ST
 MEK + Antine
 Resin on Cap
 Liner Side
 Vice Ventr
 System

(30)

Formerly
 owned by Taylor
 aircraft made
 small observation
 aircraft Abrasive
~~3040~~
 Roll off Liner
 ORIENT SE
 Manager Truck
 & Yellow Buckle
 On Concrete
 No sign of
 Spills or leaks
 1985
 Old airplane hangar
 Old debris Unsaleable
 product

(31)

Two Partially Filled
liver drums

liver Side
Roll off box

Photo ORIENT W
240 C.Y. On
Concrete Managed
Solid Waste.

On the East
Side of Plant
No sign of spills
or leaks

(32)

liver Ships out
Roll of liners
to the "People"
who actually
stamp the bottle
cap rolls
Print Foam
Seal

Trim from coating
Goa into the
Roll off box
Primarily make lid
liners

Melt Wax
and Coat the
liners

(3)

QC primarily
Weight 1 lb
Physical Tests

little still
on concrete
in compound

Photo Oriented
No sign of leaks
spills or
leakage

Distill Methyle
Chloride cleaner
+ reuse methyle
chloride 2 x 2
about 2 x 2
by 3.5 - high

357

Methylene
Product
in this
Concrete
Chloride
Storage
Room
Floor

Green
Foam
Paper
Chip board
wax, Coating
adhesive,
Poly vinyl acetate
Paraffin

Then they
print
also have
melt for EVA
Also have solvent
mixer. provides
certain vapor trans.

(35)

The liner must
meet immersion tests

Suncap Abrasives, Inc.

Suncap Liner Technology, Inc.

Quality Repair and
Maintenance

They generate
forklifts; from
forklift maintenance
Safety - Kleen

Photo Hydraulic
Oil 55 - Gallon
Pump

on

(36)

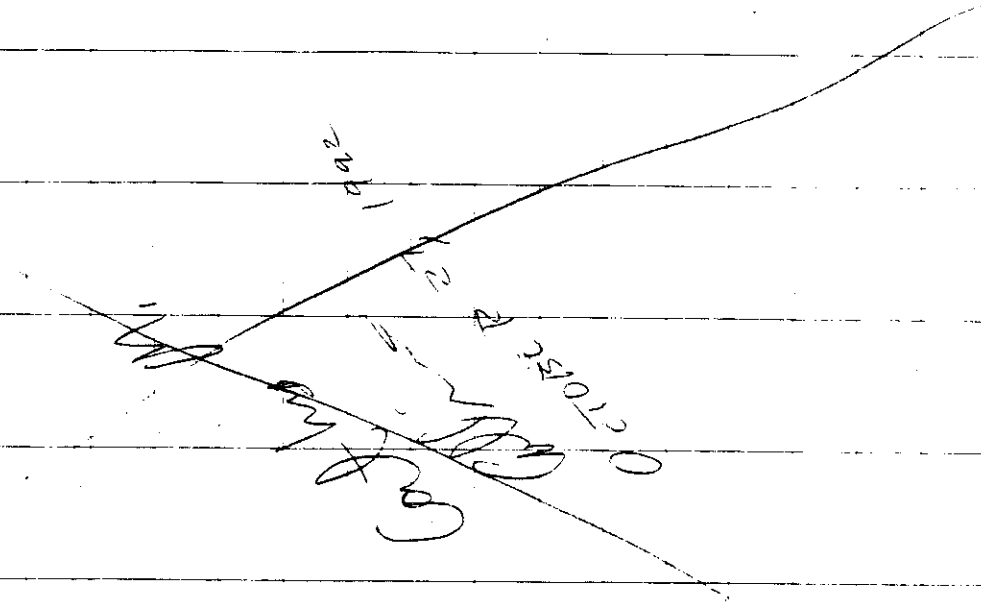
Concrete floor
minor oil type
spill around the
drum w. sign
of large release

END FACILITY TOUR
12:45 PM

GW floor is SW.

PRC CONDUCTED
A COGNITIVE CONFERENCE
WITH GAIL KITTLESON
AND CONFIRMED THE
INFORMATION GATHERED DURING
THE VSI. PRC ALSO REQUESTED
ADDITIONAL INFORMATION
TO BE SENT AT A

(35)



(37)

DATE	TIME
PRC OFF	1:30 PM.

~~Callie M.~~
~~Callie~~
~~October 27,~~
~~1942~~

ATTACHMENT C
SETTLING LAGOONS GROUND-WATER ANALYTICAL RESULTS



LANCY ENVIRONMENTAL SERVICES
DIVISION LANCY INTERNATIONAL INC.
An Alcoa Separations Technology Company



P.O. Box 419
Pittsburgh, PA 15230-0419
Phone (412) 772-0044 • FAX (412) 772-0055

ANALYSIS REPORT

SIA America, Inc.
P.O. Box 2296
Alliance, OH 44601-0216

Attention: Donald Monnot

Report Date 12/19/88 (Rev. 12/22/88**)
Sample Date 11/21/88 by CC
Received 11/21/88 by FM
Analyzed 11/21 - 12/16/88 by Staff
No. of Samples 6
Purchase Order # 29958

Project #20819

Sample #	Well 1	Well 2	Well 3	Well 4
Lab Reference #	<u>8110683</u>	<u>8110684</u>	<u>8110685</u>	<u>8110686</u>
	(mg/L)	(mg/L)	(mg/L)	(mg/L)
Parameter				
*pH (SU)	6.5	6.5	7.0	8.6
*Specific Conductance (umhos)	1980	>1990	>1990	>1990
Total Dissolved Solids	2500	4500	4000	3000
Oil and Grease	<2.0	<2.0	<2.0	<2.0
Biochemical Oxygen Demand	16	6.5	9.2	10
Chemical Oxygen Demand	42	13	20	22
Chloride	10	21	18	12
Cyanide, Total	0.01	<0.01	<0.01	<0.01
Phenols	0.012	<0.002	<0.002	0.017
Sulfate	1800	3100	2800	2300
Total Organic Carbon	17	17	13	13
Total Organic Halides	<0.010	0.030	<0.010	0.010
Antimony	<0.2	0.24	<0.2	<0.2
Arsenic	0.004	<0.002	<0.002	<0.01
Beryllium	<0.002	<0.002	<0.002	<0.002
Cadmium	<0.004	<0.004	<0.004	<0.004
Chromium	0.009	<0.006	0.006	0.007
Copper	0.01	<0.007	<0.007	<0.007
Iron	<0.006	0.22	0.17	0.07
Lead	<0.1	<0.1	<0.1	0.1
Manganese	<0.001	2.6	0.38	<0.001
Mercury	<0.0002	<0.0002	<0.0002	<0.0002
Nickel	<0.02	<0.02	<0.02	<0.02
Selenium	0.009	0.015	0.019	0.050
Silver	<0.01	<0.01	<0.01	<0.01
Sodium	225	130	210	330
Thallium	<0.3	43	28	<0.3
Zinc	<0.05	<0.05	<0.05	<0.05
Polychlorinated Biphenyls (µg/L)	<1.0	<1.0	<1.0	<1.0

*Field Measurement

**Revised to show arsenic results.


C. John Fitzer, Manager-Technical Operations



ANALYSIS REPORT

SIA America, Inc.

12/19/88
29958

Project #20819

Sample # Lab Reference #	Well 1 8110683 (µg/L)	Well 2 8110684 (µg/L)	Well 3 8110685 (µg/L)	Well 4 8110686 (µg/L)
<u>Acid Extractables</u>				
4-Chloro-3-methylphenol	<10	<10	<10	<10
2-Chlorophenol	<10	<10	<10	<10
2,4-Dichlorophenol	<10	<10	<10	<10
2,4-Dimethylphenol	<10	<10	<10	<10
4,6-Dinitro-o-cresol	<50	<50	<50	<50
2,4-Dinitrophenol	<50	<50	<50	<50
2-Nitrophenol	<10	<10	<10	<10
4-Nitrophenol	<50	<50	<50	<50
Pentachlorophenol	<50	<50	<50	<50
Phenol	<10	<10	<10	<10
2,4,6-Trichlorophenol	<10	<10	<10	<10
<u>Base Neutrals</u>				
Acenaphthene	<10	<10	<10	<10
Acenaphthylene	<10	<10	<10	<10
Anthracene	<10	<10	<10	<10
Benzo(a)anthracene	<10	<10	<10	<10
Benzidine	<50	<50	<50	<50
Benzo(b)fluoranthene	<10	<10	<10	<10
Benzo(k)fluoranthene	<10	<10	<10	<10
Benzo(ghi)perylene	<10	<10	<10	<10
Benzo(a)pyrene	<10	<10	<10	<10
Bis(2-chloroethoxy)methane	<10	<10	<10	<10
Bis(2-chloroethyl)ether	<10	<10	<10	<10
Bis(2-chloroisopropyl)ether	<10	<10	<10	<10
Bis(2-ethylhexyl)phthalate	<10	<10	<10	<10
4-Bromophenyl phenyl ether	<10	<10	<10	<10
Butyl benzyl phthalate	<10	<10	<10	<10
2-Chloronaphthalene	<10	<10	<10	<10
4-Chlorophenyl phenyl ether	<10	<10	<10	<10
Chrysene	<10	<10	<10	<10
Dibenzo(a,h)anthracene	<10	<10	<10	<10
Di-n-butyl phthalate	<10	<10	<10	<10
1,2-Dichlorobenzene	<10	<10	<10	<10
1,3-Dichlorobenzene	<10	<10	<10	<10
1,4-Dichlorobenzene	<10	<10	<10	<10
3,3'-Dichlorobenzidine	<20	<20	<20	<20


C. John Ritzert, Manager-Technical Operations

ANALYSIS REPORT



LANCY ENVIRONMENTAL SERVICES
DIVISION OF LANCY INTERNATIONAL, INC.
An Alcoa Separations Technology Company



P.O. Box 419
Pittsburgh, PA 15230-0419
Phone (412) 772-0044 • FAX (412) 772-0055

SIA America, Inc.

12/19/88
29958

Project #20819

Sample #	Well 1	Well 2	Well 3	Well 4
Lab Reference #	8110683	8110684	8110685	8110686
	(µg/L)	(µg/L)	(µg/L)	(µg/L)
<u>Base Neutrals</u> (cont'd)				
Diethyl phthalate	<10	<10	<10	<10
Dimethyl phthalate	<10	<10	<10	<10
2,4-Dinitrotoluene	<10	<10	<10	<10
2,6-Dinitrotoluene	<10	<10	<10	<10
Di-n-octyl phthalate	<10	<10	<10	<10
1,2-Diphenylhydrazine	<10	<10	<10	<10
Fluoranthene	<10	<10	<10	<10
Fluorene	<10	<10	<10	<10
Hexachlorobenzene	<10	<10	<10	<10
Hexachlorobutadiene	<10	<10	<10	<10
Hexachlorocyclopentadiene	<10	<10	<10	<10
Hexachloroethane	<10	<10	<10	<10
Indeno(1,2,3-cd)pyrene	<10	<10	<10	<10
Isophorone	<10	<10	<10	<10
Naphthalene	<10	<10	<10	<10
Nitrobenzene	<10	<10	<10	<10
N-Nitrosodimethylamine	<10	<10	<10	<10
N-Nitrosodiphenylamine	<10	<10	<10	<10
N-Nitrosodi-n-propylamine	<10	<10	<10	<10
Phenanthrene	<10	<10	<10	<10
Pyrene	<10	<10	<10	<10
1,2,4-Trichlorobenzene	<10	<10	<10	<10
2,3,7,8-TCDD	ND	ND	ND	ND

ND = Not Detected


C. John Ritzert, Manager Technical Operations



ANALYSIS REPORT

SIA America, Inc.

12/19/88
29958

Project #20819

Sample #	Well 1	Well 2	Well 3	Well 4
Lab Reference #	8110683	8110684	8110685	8110686
	(µg/L)	(µg/L)	(µg/L)	(µg/L)
<u>Volatiles</u>				
Acrolein	<50	<50	<50	<50
Acrylonitrile	<50	<50	<50	<50
Benzene	<5.0	<5.0	<5.0	<5.0
Bromodichloromethane	<5.0	<5.0	<5.0	<5.0
Bromomethane	<10	<10	<10	<10
Carbon tetrachloride	<5.0	<5.0	<5.0	<5.0
Chlorobenzene	<5.0	<5.0	<5.0	<5.0
Chloroethane	<10	<10	<10	<10
2-Chloroethylvinylether	<5.0	<5.0	<5.0	<5.0
Chloroform	<5.0	<5.0	<5.0	<5.0
Chloromethane	<10	<10	<10	<10
Dibromochloromethane	<5.0	<5.0	<5.0	<5.0
1,1-Dichloroethane	<5.0	<5.0	<5.0	<5.0
1,2-Dichloroethane	<5.0	<5.0	<5.0	<5.0
1,1-Dichloroethene	<5.0	<5.0	<5.0	<5.0
(trans)-1,2-Dichloroethene	<5.0	<5.0	<5.0	<5.0
Dichloromethane	<5.0	<5.0	<5.0	<5.0
1,2-Dichloropropane	<5.0	<5.0	<5.0	<5.0
(cis)-1,3-Dichloropropene	<5.0	<5.0	<5.0	<5.0
Ethyl benzene	<5.0	<5.0	<5.0	<5.0
1,1,2,2-Tetrachloroethane	<5.0	<5.0	<5.0	<5.0
Tetrachloroethene	<5.0	<5.0	<5.0	<5.0
Toluene	<5.0	<5.0	<5.0	<5.0
Tribromomethane	<5.0	<5.0	<5.0	<5.0
1,1,1-Trichloroethane	<5.0	<5.0	<5.0	<5.0
1,1,2-Trichloroethane	<5.0	<5.0	<5.0	<5.0
Trichloroethene	<5.0	<5.0	<5.0	<5.0
Vinyl chloride	<5.0	<5.0	<5.0	<5.0
Acetone	<10	<10	<10	110
Methyl Ethyl Ketone	<10	<10	<10	<10
Xylenes (total)	<5.0	<5.0	<5.0	<5.0

C: John Ritzert, Manager Technical Operations



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ANALYSIS REPORT

SIA America, Inc.

12/19/88 (Rev. 12/22/88*)
29958

Project #20819

Sample #	Equip. Blank	Trip Blank
Lab Reference #	8110687	8110688
	(mg/L)	(mg/L)
Parameter		
pH (SU)	5.3	5.9
Specific Conductance (umhos)	7.0	1.0
Total Dissolved Solids	<1.0	<1.0
Oil and Grease	<2.0	<2.0
Biochemical Oxygen Demand	3.0	1.4
Chemical Oxygen Demand	2.5	<1.0
Chloride	<1.0	<1.0
Cyanide, Total	<0.01	<0.01
Phenols	0.017	<0.002
Sulfate	1.3	1.5
Total Organic Carbon	<1.0	2.9
Total Organic Halides	<0.010	<0.010
Antimony	<0.2	<0.2
Arsenic	<0.002	<0.002
Beryllium	<0.002	<0.002
Cadmium	<0.004	<0.004
Chromium	<0.006	<0.006
Copper	<0.007	<0.007
Iron	<0.006	<0.006
Lead	<0.1	<0.1
Manganese	<0.001	<0.001
Mercury	<0.0002	<0.0002
Nickel	<0.02	<0.02
Selenium	0.004	0.003
Silver	<0.01	<0.01
Sodium	<0.1	<0.1
Thallium	<0.3	<0.3
Zinc	<0.05	<0.05
Polychlorinated Biphenyls (µg/L)	<1.0	<1.0

*Revised to show arsenic results.


C. John Ritzert, Manager-Technical Operations



ANALYSIS REPORT

SIA America, Inc.

12/19/88
29958

Project #20819

Sample # Lab Reference #	Equip. Blank 8110687 ($\mu\text{g/L}$)	Trip Blank 8110688 ($\mu\text{g/L}$)
<u>Acid Extractables</u>		
4-Chloro-3-methylphenol	<10	<10
2-Chlorophenol	<10	<10
2,4-Dichlorophenol	<10	<10
2,4-Dimethylphenol	<10	<10
4,6-Dinitro-o-cresol	<50	<50
2,4-Dinitrophenol	<50	<50
2-Nitrophenol	<10	<10
4-Nitrophenol	<50	<50
Pentachlorophenol	<50	<50
Phenol	<10	<10
2,4,6-Trichlorophenol	<10	<10
<u>Base Neutrals</u>		
Acenaphthene	<10	<10
Acenaphthylene	<10	<10
Anthracene	<10	<10
Benzo(a)anthracene	<10	<10
Benzidine	<50	<50
Benzo(b)fluoranthene	<10	<10
Benzo(k)fluoranthene	<10	<10
Benzo(ghi)perylene	<10	<10
Benzo(a)pyrene	<10	<10
Bis(2-chloroethoxy)methane	<10	<10
Bis(2-chloroethyl)ether	<10	<10
Bis(2-chloroisopropyl)ether	<10	<10
Bis(2-ethylhexyl)phthalate	<10	<10
4-Bromophenyl phenyl ether	<10	<10
Butyl benzyl phthalate	<10	<10
2-Chloronaphthalene	<10	<10
4-Chlorophenyl phenyl ether	<10	<10
Chrysene	<10	<10
Dibenzo(a,h)anthracene	<10	<10
Di-n-butyl phthalate	<10	<10
1,2-Dichlorobenzene	<10	<10
1,3-Dichlorobenzene	<10	<10
1,4-Dichlorobenzene	<10	<10
3,3'-Dichlorobenzidine	<20	<20


C. John Ritzert, Manager Technical Operations

ANALYSIS REPORT



LANCY ENVIRONMENTAL SERVICES
DIVISION OF LANCY INTERNATIONAL, INC.
An Alcoa Separations Technology Company



P.O. Box 419
Pittsburgh, PA 15230-0419
Phone (412) 772-0044 • FAX (412) 772-0055

SIA America, Inc.

12/19/88
29958

Project #20819

Sample # Lab Reference #	Equip. Blank <u>8110687</u> (µg/L)	Trip Blank <u>8110688</u> (µg/L)
<u>Base Neutrals</u> (cont'd)		
Diethyl phthalate	<10	<10
Dimethyl phthalate	<10	<10
2,4-Dinitrotoluene	<10	<10
2,6-Dinitrotoluene	<10	<10
Di-n-octyl phthalate	<10	<10
1,2-Diphenylhydrazine	<10	<10
Fluoranthene	<10	<10
Fluorene	<10	<10
Hexachlorobenzene	<10	<10
Hexachlorobutadiene	<10	<10
Hexachlorocyclopentadiene	<10	<10
Hexachloroethane	<10	<10
Indeno(1,2,3-cd)pyrene	<10	<10
Isophorone	<10	<10
Naphthalene	<10	<10
Nitrobenzene	<10	<10
N-Nitrosodimethylamine	<10	<10
N-Nitrosodiphenylamine	<10	<10
N-Nitrosodi-n-propylamine	<10	<10
Phenanthrene	<10	<10
Pyrene	<10	<10
1,2,4-Trichlorobenzene	<10	<10
2,3,7,8-TCDD	ND	ND

ND = Not Detected


C. John Ritzert, Manager-Technical Operations



ANALYSIS REPORT

SIA America, Inc.

12/19/88
29958

Project #20819

Sample # Lab Reference #	Equip. Blank <u>8110687</u> ($\mu\text{g/L}$)	Trip Blank <u>8110688</u> ($\mu\text{g/L}$)
<u>Volatiles</u>		
Acrolein	<50	<50
Acrylonitrile	<50	<50
Benzene	<5.0	<5.0
Bromodichloromethane	<5.0	<5.0
Bromomethane	<10	<10
Carbon tetrachloride	<5.0	<5.0
Chlorobenzene	<5.0	<5.0
Chloroethane	<10	<10
2-Chloroethylvinylether	<5.0	<5.0
Chloroform	<5.0	<5.0
Chloromethane	<10	<10
Dibromochloromethane	<5.0	<5.0
1,1-Dichloroethane	<5.0	<5.0
1,2-Dichloroethane	<5.0	<5.0
1,1-Dichloroethene	<5.0	<5.0
(trans)-1,2-Dichloroethene	<5.0	<5.0
Dichloromethane	<5.0	<5.0
1,2-Dichloropropane	<5.0	<5.0
(cis)-1,3-Dichloropropene	<5.0	<5.0
Ethyl benzene	<5.0	<5.0
1,1,2,2-Tetrachloroethane	<5.0	<5.0
Tetrachloroethene	<5.0	<5.0
Toluene	<5.0	<5.0
Tribromomethane	<5.0	<5.0
1,1,1-Trichloroethane	<5.0	<5.0
1,1,2-Trichloroethane	<5.0	<5.0
Trichloroethene	<5.0	<5.0
Vinyl chloride	<5.0	<5.0
Acetone	<10	<10
Methyl Ethyl Ketone	<10	<10
Xylenes (total)	<5.0	<5.0


C. John Ritzert, Manager-Technical Operations

ATTACHMENT D
HARDENED RESIN ANALYTICAL RESULTS



**WADSWORTH/ALERT
LABORATORIES, INC.**

Sampling, testing, mobile labs

4101 Shuffel Drive N.W. / North Canton, Ohio 44720

ANALYTICAL REPORT

Presented to :

KITTY LUCAS

SIA AMERICA

WADSWORTH/ALERT LABORATORIES, INC.

Marvin W. Stephens

Marvin W. Stephens, Ph.D.

Vice President & Corporate Technical Director

March 16, 1989



CORPORATE AND LABORATORY: North Canton, Ohio (216) 497-9396
LABORATORY: Cleveland, Ohio (216) 642-9151
LABORATORY: Bartow, Florida (813) 533-2150
SOUTHEAST REGIONAL OFFICE: Lexington, South Carolina (803) 957-6590
24-HOUR ALERT LINE: (216) 497-9338



WADSWORTH/ALERT
LABORATORIES, INC.

Explanation of Extractable Organic Halogens

The methodology for Total Organic Halogens in solids uses the terminology of Extractable Organic Halogens in describing the analysis. At this time samples received by Wadsworth/ALERT Laboratories requesting Total Organic Halogens on solids will be reported as Extractable Organic Halogens.



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : SIA AMERICA
LAB #: 3580-10799
MATRIX: SOLID

DATE RECEIVED: 2/21/89
DATE EXTRACTED: 2/22/89
DATE ANALYZED: 3/ 2/89

SAMPLE ID: SOLID SAMPLE RECEIVED 2/21/89

POLYCHLORINATED BIPHENYLS
METHOD 8080 LIST - GC

PCB-1016	ND
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 1 mg/kg) as rec
ND* (None Detected, lower detectable limit = mg/kg) as rec
-- (Not Analyzed)



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : SIA AMERICA
LAB #: 3580-10799
MATRIX : SOLID

DATE RECEIVED: 2/21/89

SAMPLE ID : SOLID SAMPLE RECEIVED 2/21/89

**METALS ANALYTICAL REPORT
SELECTED LIST**

Leachate testing in accordance with USEPA Manual SW846 Method 1310

EP EXTRACTION DATE: 3/ 6/89

ELEMENT	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT	
Silver	3/ 6- 3/ 9/89	ND	0.01	mg/l
Arsenic	3/ 6- 3/ 9/89	ND	0.005	mg/l
Barium	3/ 6- 3/ 9/89	1.1	0.01	mg/l
Cadmium	3/ 6- 3/ 9/89	ND	0.01	mg/l
Chromium	3/ 6- 3/ 9/89	ND	0.02	mg/l
Mercury	3/ 8- 3/10/89	ND	0.005	mg/l
Nickel	3/ 6- 3/ 9/89	ND	0.04	mg/l
Lead	3/ 6- 3/ 9/89	ND	0.05	mg/l
Selenium	3/ 6- 3/ 9/89	ND	0.005	mg/l

NOTE: ND (None Detected)

Initial pH	5.9	su
Final pH	4.8	su
Amount of acetic acid used per method	9	ml



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : SIA AMERICA
LAB #: 3580-10799
MATRIX : SOLID

DATE RECEIVED: 2/21/89

SAMPLE ID : SOLID SAMPLE RECEIVED 2/21/89

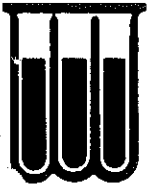
ANALYTICAL REPORT

Leachate testing in accordance with Method 1310 using deionized water as the extraction media with no pH adjustment.

DI EXTRACTION DATE : 3/ 1/89

PARAMETER	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT	
Cyanide	2/24/89	ND	0.5	mg/k
Extractable Organic Halogens	3/ 6/89	ND	2.5	mg/k
EP Cyanide(DI)	3/ 3/89	ND	0.005	mg/
EP Free Cyanide(DI)	3/ 3/89	ND	0.005	mg/
EP Fluoride(DI)	3/ 3/89	ND	0.1	mg/
Flash Point	2/22/89	>140		deg
Total Recoverable Phenolics	2/27- 2/28/89	3.6	0.2	mg/k
pH	2/22/89	6.0		s
Sulfide	2/22/89	ND	50	mg/k
Total Solids	2/23- 2/24/89	96	0.5	

NOTE: ND (None Detected)



WADSWORTH/ALERT
LABORATORIES, INC.

QUALITY CONTROL SECTION



WADSWORTH/ALERT
LABORATORIES, INC.

MATRIX SPIKE DATA

LAB ID	PARAMETER	SPIKE PERCENT RECOVERY	SPK/DUP PERCENT RECOVERY	SPIKE MATRIX	QC CONTROL LIMITS
890220	Polychlorinated Biphenyls	89	83	SOLID	(51-131)
10799	Cyanide	90	98	WATER	(45-120)
890221	Fluoride	90	90	WATER	(76-126)
890227	Phenols	86	85	SOLID	(44-152)
890217	Sulfide	73	72	SOLID	(47-118)



WADSWORTH/ALERT
LABORATORIES, INC.

MATRIX SPIKE DATA

LAB ID	PARAMETER	SPIKE PERCENT RECOVERY	SPK/DUP PERCENT RECOVERY	SPIKE MATRIX	QC CONTROL LIMITS
890301	Arsenic	120	122	WATER	(60-137)
890301	Barium	83	82	WATER	(72-112)
890301	Cadmium	98	97	WATER	(74-108)
890301	Chromium	86	80	WATER	(74-110)
890301	Mercury	103	96	WATER	(59-132)
890301	Lead	77	78	WATER	(72-113)
890301	Selenium	69	70	WATER	(45-106)
890224	Nickel	80	82	WATER	(72-106)
890227	Silver	97	96	WATER	(67-110)



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9289-92222
MATRIX: SOLID

DATE RECEIVED: 2/22/89
DATE EXTRACTED: 2/22/89
DATE ANALYZED: 3/ 6/89

SAMPLE ID: INTRA-LAB BLANK , 2 /22/89

POLYCHLORINATED BIPHENYLS
ANALYTICAL BLANK REPORT

PCB-1016	ND
PCB-1221	ND
PCB-1232	ND
PCB-1242	ND
PCB-1248	ND
PCB-1254	ND
PCB-1260	ND
PCB-1262	--

NOTE: ND (None Detected, lower detectable limit = 1 mg/kg) as rec'd
ND* (None Detected, lower detectable limit = mg/kg) as rec'd
-- (Not Analyzed)



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories, Inc.
LABORATORY ID : 9089-90306
SAMPLE MATRIX : WATER

RECEIVING DATE : 3/ 6/89

SAMPLE ID : INTRA-LAB BLANK , 3 /6 /89

METALS ANALYTICAL BLANK REPORT

ELEMENT	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT
Silver	3/ 6- 3/ 8/89	ND	0.01 mg/l
Arsenic	3/ 6/89	ND	0.005 mg/l
Barium	3/ 6- 3/ 8/89	ND	0.01 mg/l
Cadmium	3/ 6- 3/ 8/89	ND	0.01 mg/l
Chromium	3/ 6- 3/ 8/89	ND	0.02 mg/l
Nickel	3/ 6- 3/ 8/89	ND	0.04 mg/l
Lead	3/ 6- 3/ 8/89	ND	0.05 mg/l
Selenium	3/ 6/89	ND	0.005 mg/l

ND - NONE DETECTED



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories, Inc.
LABORATORY ID : 9089-90308
SAMPLE MATRIX : WATER

RECEIVING DATE : 3/ 8/89

SAMPLE ID : INTRA-LAB BLANK , 3 /8 /89

METALS ANALYTICAL BLANK REPORT

ELEMENT	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT
Mercury	3/ 8- 3/10/89	ND	0.005 mg/l

ND - NONE DETECTED



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9089-90222
MATRIX : WATER

DATE RECEIVED: 2/22/89

SAMPLE ID : INTRA-LAB BLANK , 2 /22/89

GENERAL ANALYTICAL BLANK REPORT

PARAMETER	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT	
Biochemical Oxygen Demand	2/22- 2/27/89	ND	2	mg/l
Chloride	2/22/89	ND	2	mg/l
Cyanide	2/22/89	ND	0.005	mg/l
Chemical Oxygen Demand	2/22/89	ND	5	mg/l
Ammonia Nitrogen	2/22/89	ND	0.2	mg/l
Total Recoverable Phenolics	2/22/89	ND	0.01	mg/l
Sulfate	2/22/89	ND	5	mg/l
Sulfide	2/22/89	ND	1	mg/l
Total Kjeldahl Nitrogen	2/22- 2/23/89	ND	0.3	mg/l
Total Organic Carbon	2/22/89	ND	1	mg/l
Total Organic Halogen	2/22/89	ND	10	ug/l
Total Solids	2/22- 2/23/89	ND	0.5	%
Total Suspended Solids	2/22- 2/23/89	ND	5	mg/l

NOTE: ND (None Detected)



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9089-90223
MATRIX : WATER

DATE RECEIVED: 2/23/89

SAMPLE ID : INTRA-LAB BLANK , 2 /23/89

GENERAL ANALYTICAL BLANK REPORT

PARAMETER	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT
Biochemical Oxygen Demand	2/23- 2/28/89	ND	2 mg/l
Cyanide	2/23/89	ND	0.005 mg/l
Fecal Coliform	2/23- 2/24/89	ND	10 /100 ml
Ammonia Nitrogen	2/23/89	ND	0.2 mg/l
Oil and Grease	2/23/89	ND	1 mg/l
Total Organic Nitrogen	2/23- 2/24/89	ND	0.2 mg/l
Phosphate Phosphorus	2/23/89	ND	0.1 mg/l
Sulfide	2/23/89	ND	1 mg/l
Total Kjeldahl Nitrogen	2/23- 2/24/89	ND	0.3 mg/l
Total Organic Carbon	2/23/89	ND	1 mg/l
Total Solids	2/23- 2/24/89	ND	0.5 %

NOTE: ND (None Detected)



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9089-90224
MATRIX : WATER

DATE RECEIVED: 2/24/89

SAMPLE ID : INTRA-LAB BLANK , 2 /24/89

GENERAL ANALYTICAL BLANK REPORT

PARAMETER	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT	
Acidity (CaCO ₃ to pH 8.5)	2/24/89	ND	20	ueq/l
Alkalinity (CaCO ₃ to pH 4.5)	2/24/89	ND	20	mg/l
Biochemical Oxygen Demand	2/24- 3/ 1/89	ND	2	mg/l
Bromide	2/24/89	ND	0.2	mg/l
Cyanide	2/24/89	ND	0.005	mg/l
Chemical Oxygen Demand	2/24/89	ND	5	mg/l
Methylene Blue Active Substances	2/24/89	ND	0.1	mg/l
Ammonia Nitrogen	2/24/89	ND	0.2	mg/l
Oil and Grease	2/24/89	ND	1	mg/l
Residual Chlorine	2/24/89	ND	0.03	mg/l
Sulfite	2/24/89	ND	2	mg/l
Sulfide	2/24/89	ND	1	mg/l
Total Dissolved Solids	2/24- 2/27/89	ND	5	mg/l
Total Organic Carbon	2/24/89	ND	1	mg/l
Total Solids	2/24- 2/27/89	ND	0.5	%
Total Suspended Solids	2/24- 2/27/89	ND	5	mg/l

NOTE: ND (None Detected)



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9089-90227
MATRIX : WATER

DATE RECEIVED: 2/27/89

SAMPLE ID : INTRA-LAB BLANK , 2 /27/89

GENERAL ANALYTICAL BLANK REPORT

PARAMETER	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT	
Cyanide	2/27/89	ND	0.005	mg/l
Oil and Grease	2/27- 2/28/89	ND	1	mg/l
Total Recoverable Phenolics	2/27- 2/28/89	ND	0.01	mg/l
Total Dissolved Solids	2/27- 2/28/89	ND	5	mg/l
Total Organic Halogen	2/27/89	ND	10	ug/l
Total Solids	2/27- 2/28/89	ND	0.5	%
Total Suspended Solids	2/27- 2/28/89	ND	5	mg/l

NOTE: ND (None Detected)



WADSWORTH/ALERT
LABORATORIES, INC.

COMPANY : Wadsworth/Alert Laboratories
LAB #: 9089-90303
MATRIX : WATER

DATE RECEIVED: 3/ 3/89

SAMPLE ID : INTRA-LAB BLANK , 3 /3 /89

GENERAL ANALYTICAL BLANK REPORT

PARAMETER	PREPARATION - ANALYSIS DATE	RESULT	DETECTION LIMIT	
Alkalinity (CaCO ₃ to pH 4.5)	3/ 3/89	ND	20	mg/l
Biochemical Oxygen Demand	3/ 3- 3/ 8/89	ND	2	mg/l
Chloride	3/ 3/89	ND	2	mg/l
Cyanide	3/ 3/89	ND	0.005	mg/l
Fluoride	3/ 3/89	ND	0.1	mg/l
Hardness (CaCO ₃)	3/ 3/89	ND	5	mg/l
Methylene Blue Active Substances	3/ 3/89	ND	0.1	mg/l
Nitrite Nitrogen	3/ 3/89	ND	0.04	mg/l
Nitrate Nitrogen	3/ 3/89	ND	0.1	mg/l
Nitrate-Nitrite Nitrogen	3/ 3/89	ND	0.1	mg/l
Sulfite	3/ 3/89	ND	2	mg/l
Sulfate	3/ 3/89	ND	5	mg/l
Sulfide	3/ 3/89	ND	1	mg/l
Total Dissolved Solids	3/ 3- 3/ 6/89	ND	5	mg/l
Total Organic Carbon	3/ 3/89	ND	1	mg/l
Total Solids	3/ 3- 3/ 6/89	ND	0.5	%
Total Suspended Solids	3/ 3- 3/ 6/89	ND	5	mg/l

NOTE: ND (None Detected)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY RECEIVED
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590
WMD RECORD CENTER
SEP 11 1992

REPLY TO THE ATTENTION OF:
HRE-8J

October 16, 1992

Mr. G. Kittleson
Sancap Abrasives, Inc.
16123 Armour Street N.E.
Alliance, OH 44601

Re: Visual Site Inspection
Sancap Abrasives, Inc.
Alliance, OH
ID No. OHD 093 289 700

Dear Mr. Kittleson:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

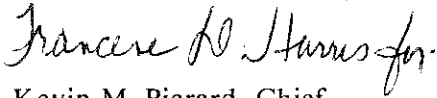
The VSI has been scheduled for October 27, 1992, at 8:30 a.m. The inspection team will consist of Cathy Collins and Hans Upadhyay of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

Mr. G. Kittleson
October 16, 1992
Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Francene Harris for".

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Ed Lim, OEPA
Dave Wertz, OEPA, Northeast District

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

May 21, 1992

Re: Alliance
Stark County
Application No. 02-6151
Application for Wastewater Lagoon Closure for
SIA America, Inc.
Received June 19, 1991, Final Revisions Received
April 22, 1992
From Pace, Inc.

Sancap Abrasives
16123 Armour Street, NE
Alliance, Ohio 44601

Gentlemen:

CERTIFIED MAIL

Enclosed is the Ohio EPA Permit to Install which will allow you to install the described source in the manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

As indicated on the permit, you are required to pay a permit fee as provided for by Section 3745.11 of the Ohio Revised Code and any rules established thereunder. The exact amount of this fee is indicated on page 1 of the Permit to Install. This amount must be remitted within fifteen (15) days of the effective date of the Permit to Install. Checks should be made payable to: Treasurer, State of Ohio and sent to Permits Bookkeeper, Ohio Environmental Protection Agency, P. O. Box 1049, 1800 WaterMark Dr., Columbus, Ohio 43266-0149.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code by any person who was a party to this proceeding. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Law Division of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review
236 East Town Street, Room 300
Columbus, Ohio 43266-0557

OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit to Install

Application No. 02-6151

Applicant's Name: Sancap Abrasives

Permit Fee \$50.00

Address: 16123 Armour Street, NE

City: Alliance

State: Ohio 44601

Person to Contact: Dale E. Skoff
Telephone: (412) 772-0610

Description of Proposed Source: Wastewater Lagoon Closure for SIA America, Inc.

Issuance Date: May 21, 1992

Effective Date: May 21, 1992

The above named entity is hereby granted a permit to install for the above described source pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described source of pollutants will be granted the necessary operating permits. This permit is granted subject to the following conditions attached hereto:

Ohio Environmental Protection Agency



Donald R. Schregardus

Director

P. O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

This permit shall expire if construction has not been initiated by applicant within eighteen months of the effective date of this permit. By accepting this permit, applicant acknowledges that this eighteen month period shall not be considered or construed as extending or having any effect whatsoever on any compliance schedule or deadline set forth in any administrative or court order issued to or binding upon the permit applicant, and applicant shall abide by such compliance schedules or deadlines to avoid the initiation of additional legal action by the Ohio EPA.

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, examining records or reports pertaining to the construction, modification or installation of the above described source of environmental pollutants.

Issuance of this permit does not relieve you of the duty of complying with all applicable federal, state, and local laws, ordinances, and regulations.

This permit is conditioned upon payment of applicable fees as required by Section 3745.11 of the Ohio Revised Code, and shall be invalid unless the permit fee specified above has been paid in full to the Ohio EPA within fifteen days of issuance of this permit to install.

Any well, well point, pit, or other device installed for the purpose of lowering the ground water level to facilitate construction of this project shall be properly abandoned in accordance with the provisions of Section 3745-9-10 of the Ohio Administrative Code or in accordance with the provisions of this plan or as directed by the Director or his representative.

Any person installing any well, well point, pit, or other device used for the purpose of removing ground water from an aquifer shall complete and file a Well Log and Drilling Report form with the Ohio Department of Natural Resources, Division of Water, within 30 days of the well completion in accordance with the Ohio Revised Code Section 1521.01 and 1521.05. In addition, any such facility that has a capacity to withdraw waters of the state in an amount greater than 100,000 gallons per day from all sources shall be registered by the owner with the Chief of the Division of Water, Ohio Department of Natural Resources, within three months after the facility is completed in accordance with Section 1521.16 of the Ohio Revised Code. For copies of the necessary well log, drilling report, or registration forms, please contact:

Division of Water
Ohio Department of Natural Resources
Fountain Square
Columbus, Ohio 43224-1387
(614) 265-6717.

The proposed wastewater disposal system shall be constructed in strict accordance with the plans and application approved by the Director of the Ohio Environmental Protection Agency. There shall be no deviation from these plans without the prior express, written approval of the agency. Any deviations from these plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of this plan and issuance of this permit does not constitute an assurance by Ohio Environmental Protection Agency that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

All residuals from pretreatment facilities, whether defined hazardous or nonhazardous, shall be stored, transported, treated, and disposed in a manner that will comply with all applicable local, state, and federal regulations.

The Permit to Install is not an authorization to discharge pollutants to waters of the state. Pursuant to Chapter 6111 of Ohio Revised Code, the applicant shall apply for a permit to discharge (NPDES) 180 days prior of commencing any discharge from the facility herein described.

The Northeast District Office District Office of the Ohio EPA shall be notified prior to the start of construction so that construction of this system can be routinely inspected and approved by the Ohio EPA. The final request for inspection and approval of this installation shall be made at least twenty-four (24) hours in advance of its being covered with earth and/or placed into operation.

SPECIAL CONDITIONS

Semi-annual groundwater monitoring will be done for the following parameters on a semi-annual basis (June, December) for a period of 3 years following permit issuance (6 separate test result submittals. See Attachment A

ATTACHMENT A

APPENDIX

<u>PARAMETERS</u>	<u>DRINKING WATER STANDARD</u>
pH	
Conductivity	
Arsenic	50 ug/l
Barium	1,000 ug/l
Cadmium	10 ug/l
Chromium	50 ug/l
Lead	50 ug/l
Mercury	2 ug/l
Selenium	10 ug/l
Silver	50 ug/l
Thallium	
Zinc	5,000 ug/l
Oil & Grease	
Total Organic Carbon	
Total Organic Halogen	
Phenols	
Acetone	
Sulfate	250 mg/l
Nitrate	10 mg/l
Total Dissolved Solids	500 mg/l
Manganese	50 mg/l

LAGOON SEDIMENT
SAMPLING AND ANALYSIS REPORT

March, 1991

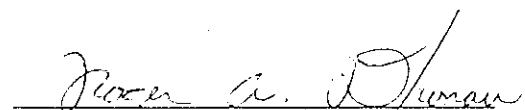
Prepared for

SIA America, Inc.
P. O. Box 2296
Alliance, Ohio 44601

Prepared by

PACE INCORPORATED
100 Marshall Drive
Warrendale, PA 15086-7527


Dale E. Skoff
Project Manager


Roger A. Dhonau
Director - Consulting Services

RECEIVED
MAY 09 1991

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 INTRODUCTION.....	1
2.0 SAMPLING PROCEDURES.....	3
3.0 ANALYTICAL RESULTS.....	5
4.0 LAGOON #1 CLASSIFICATION.....	8

FIGURES

Figure 1-1	Wastewater Treatment Lagoon Layout.....	2
Figure 2-1	Sampling Point Designations.....	4
Figure 3-1	Reactive Sulfide Concentrations Map -0-1 Ft. Interval.....	6
Figure 3-2	Reactive Sulfide Concentrations Map -0-2 Ft. Interval.....	7

ATTACHMENT

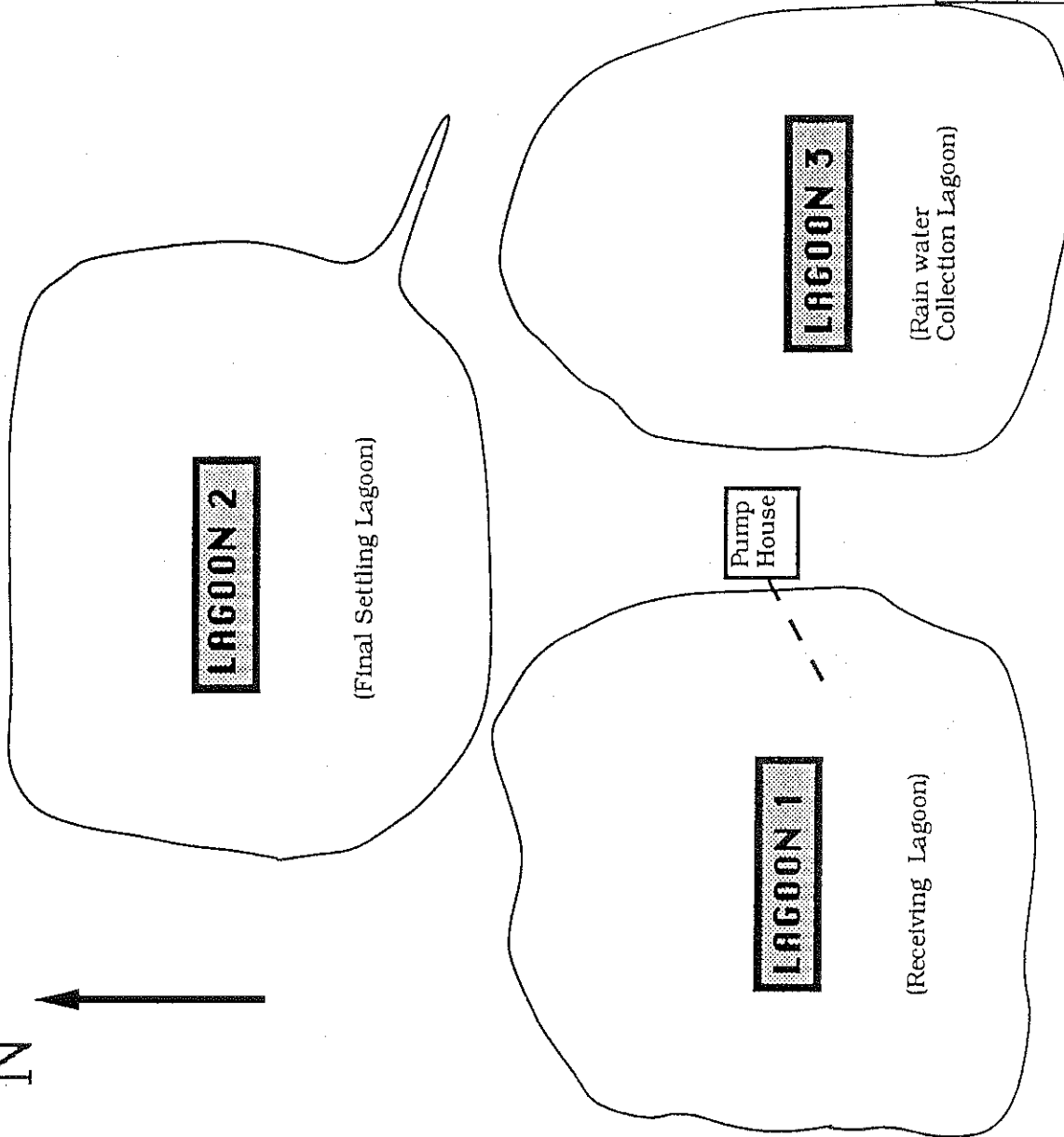
Attachment A Sediment Analytical Results
Attachment B Statistical Analyses

1.0 INTRODUCTION

In March, 1989, SIA submitted to Ohio EPA a site evaluation report prepared by Lancy ESC (now PACE) for SIA's Alliance, Ohio wastewater treatment lagoon site. The purpose of the investigation was to evaluate the adequacy of the previously submitted wastewater treatment lagoon site closure plan. As stated in the report, a reactive sulfide concentration of 496 mg/kg was detected in a sediment sample from Lagoon #1, the wastewater receiving lagoon. Ohio EPA expressed concern regarding the reactive sulfide levels in Lagoon #1 sediment, particularly as they related to classification of the impoundment as hazardous or non-hazardous. (EPA has recommended that wastes exhibiting greater than 500 mg/kg reactive sulfide be classified as a hazardous waste because of the characteristic of reactivity.) Figure 1-1 shows the location of Lagoon #1 within the SIA wastewater treatment lagoon system.

To enable classification of Lagoon #1, Lancy ESC submitted a lagoon sediment sampling and analysis plan, dated January 1990, to Ohio EPA for review. On November 17, 1990, Ohio EPA approved implementation of the subject plan. This summary report describes the sampling and analysis procedures and presents findings from implementing the approved program. A detailed history and description of the site, including that of Lagoon #1, is included in previously submitted reports, and therefore, will not be repeated here.

N



Scale: 1 inch = approx. 45 feet

TITLE WASTEWATER TREATMENT LAGOONS LAYOUT					
CLIENT SIA AMERICA, INC.					
DRAWN H.J.	DATE 12/13/89	PROJECT NO. 100601.210	DRAWING NO. FIG. 1-1	REV.	
100 MARSHALL DRIVE WARRENDALE, PA 15086 412/772-0610					
pace [®] INCORPORATED THE ASSURANCE OF QUALITY					

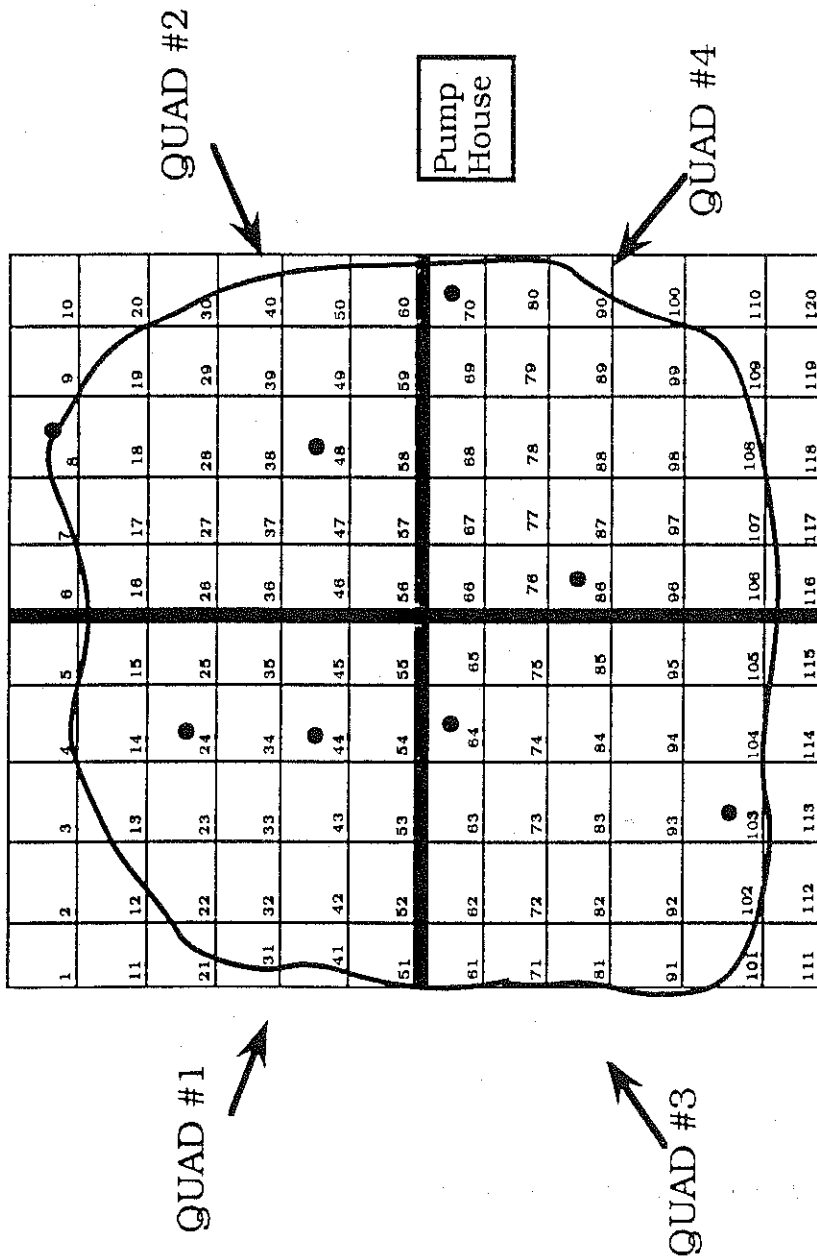
2.0 SAMPLING PROCEDURES

On December 11, 1990, PACE field technicians conducted lagoon sediment sampling activities at the SIA site at the eight locations specified in the approved sampling plan. Figure 2-1 shows the locations of sampling locations which were selected utilizing biased random selection procedures. For each location, samples were collected for the 0-1 and 1-2 feet interval, resulting in two samples per location for a total of 16 samples.

Samples were collected by field technicians positioned above sampling sites in a boat designed for sediment sampling. First, the boat's position was stabilized by ropes secured to the lagoon banks. PVC casing was then driven into the lagoon sediment, and a stainless-steel bucket auger inserted through the PVC casing into the sediment. The bucket auger was then withdrawn, the sample described, and representative portions of the sample placed into glass sampling jars. Sampling equipment was decontaminated before use and between sample locations by washing in a non-phosphate detergent followed by successive rinses in distilled water. Sample handling procedures conformed to those described in PACE's Quality Assurance Program.

N

LAGOON 1



● Sampling Locations

NOTE: Not to Scale

TITLE				SAMPLING POINT DESIGNATIONS			
CLIENT				SIA AMERICA, INC.			
DRAWN	DATE	PROJECT NO.	DRAWING NO.	REV.			
HILJ	1/90	100601.210	FIG. 2-1				
				100 MARSHALL DRIVE WARRENDALE, PA 15086 412/772-0610			
				<p>pace[®]</p> <p>INCORPORATED</p> <p>THE ASSURANCE OF QUALITY</p>			

3.0 ANALYTICAL RESULTS

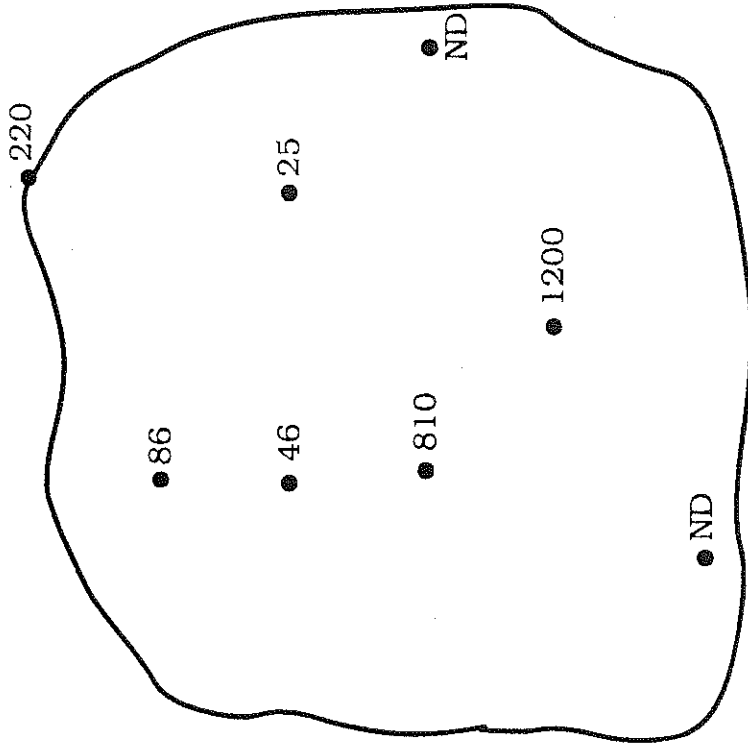
Collected samples were analyzed for reactive sulfide according to EPA Method SW846, Section 7.3. Analytical results are included as Attachment A.

Figures 3-1 and 3-2 show the concentrations of reactive sulfide detected in the 0-1 foot and 1-2 foot sample intervals, respectively. As indicated, the range in concentration among the 16 samples is from non-detected to 1,200 mg/kg. The reactive sulfide concentration in two of the samples exceed 500 mg/kg, the level at which EPA considers waste to be hazardous by characteristic of reactivity. Detected concentrations for these two locations are 810 and 1,200 mg/kg (random sample numbers 64 and 86, respectively).

N



LAGOON 1



Pump House

● Sampling Locations

ND = Non-Detected

Concentrations in mg/kg

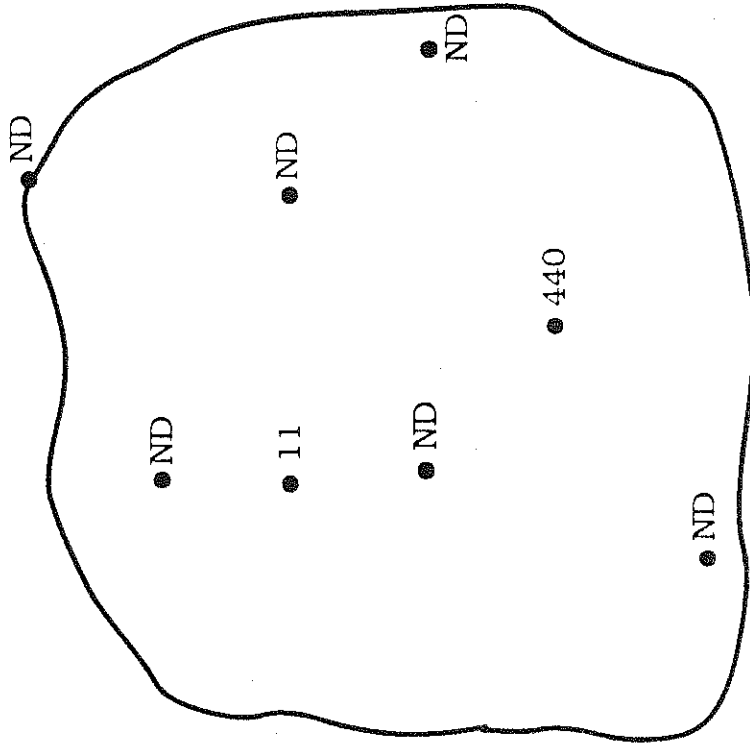
0 10' 20'

Approx. Scale

TITLE REACTIVE SULFIDE CONC. - 0-1' INTERVAL			
CLIENT SIA AMERICA, INC.			
DRAWN	DATE	PROJECT NO.	DRAWING NO.
HLJ	1/91	100601.210	Fig. 3-1
REV.			
100 MARSHALL DRIVE			
WARRENDALE, PA 15086			
412-772-0610			
<p>pace[®]</p> <p>INCORPORATED</p> <p>THE ASSURANCE OF QUALITY</p>			

N

LAGOON 1



Pump
House

● Sampling Locations

ND = Non-Detected

Concentrations in mg/kg

0 10' 20'
Approx. Scale

TITLE REACTIVE SULFIDE CONC. - 1-2' INTERVAL			
CLIENT SIA AMERICA, INC.			
DRAWN	DATE	PROJECT NO.	DRAWING NO.
HLJ	1/91	100601.210	Fig. 3-2
REV.			
100 MARSHALL DRIVE WARRENDALE, PA 15086 412-772-0610			
<p>pace[®] INCORPORATED THE ASSURANCE OF QUALITY</p>			

4.0 LAGOON #1 CLASSIFICATION

Statistical calculations were conducted on the sediment analytical results data set to determine the classification (i.e., hazardous or non-hazardous) of Lagoon #1. These calculations, included as Attachment B, indicate that at a 90% confidence interval, a sediment sample collected from the impoundment would have a reactive sulfide concentration of 269 mg/kg or less. Because this level is less than the hazardous waste determination limit of 500 mg/kg, Lagoon #1 should be classified as non-hazardous. The statistical analyses also confirm that a sufficient number of samples were collected to make this determination.

Although the impoundment should be classified as non-hazardous, analytical results indicate that portions of the sediment have reactive sulfide concentrations which exceed 500 mg/kg. Therefore, during closure operations in Lagoon #1 site safety procedures should be implemented which are consistent with the reactive sulfide levels present.

ATTACHMENT A

SEDIMENT ANALYTICAL RESULTS

REPORT OF LABORATORY ANALYSIS

January 08, 1991

Mr. Don Monnot
SIA America
P.O. Box 2296
Alliance, OH 44601-0216

RE: PACE Project No. 101217.509
100602.210

Dear Mr. Monnot:

Enclosed is the report of laboratory analyses for samples received December 11, 1990.

If you have any questions concerning this report, please feel free to contact us.

Sincerely,



David A. Danner
Director, Analytical Services

Enclosures



REPORT OF LABORATORY ANALYSIS

USA America
P.O. Box 2296
Liance, OH 44601-0216

January 08, 1991
PACE Project
Number: 101217509

Attn: Mr. Don Monnot

0602.210 Lagoon #1 Sediment

PACE Sample Number:	97 0933476	97 0933484	97 0933492
Date Collected:	12/11/90	12/11/90	12/11/90
Date Received:	12/11/90	12/11/90	12/11/90
	SIA #70	SIA #70	SIA #48
Parameter	Units	MDL	0-1 ft. 1-2 ft. 0-1 ft.

INORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Sulfide, Reactive	mg/kg	10	ND	ND	25
-------------------	-------	----	----	----	----

PACE Sample Number:	97 0933506	97 0933514	97 0933522
Date Collected:	12/11/90	12/11/90	12/11/90
Date Received:	12/11/90	12/11/90	12/11/90
	SIA #48	SIA #8	SIA #8
Parameter	Units	MDL	1-2 ft. 0-1 ft. 1-2 ft.

INORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Sulfide, Reactive	mg/kg	10	ND	220	ND
-------------------	-------	----	----	-----	----

PACE Sample Number:	97 0933530	97 0933549	97 0933557
Date Collected:	12/11/90	12/11/90	12/11/90
Date Received:	12/11/90	12/11/90	12/11/90
	SIA #103	SIA #103	SIA #86
Parameter	Units	MDL	0-1 ft. 1-2 ft. 0-1 ft.

INORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Sulfide, Reactive	mg/kg	10	160	ND	1200
-------------------	-------	----	-----	----	------

Method Detection Limit
Not detected at or above the MDL.

REPORT OF LABORATORY ANALYSIS

Don Monnot
Page 2

January 08, 1991
PACE Project
Number: 101217509

0602.210 Lagoon #1 Sediment

PACE Sample Number:
Date Collected:
Date Received:

97 0933565	97 0933573	97 0933581
12/11/90	12/11/90	12/11/90
12/11/90	12/11/90	12/11/90
SIA #86	SIA #24	SIA #24
1-2 ft.	0-1 ft.	1-2 ft.

Parameter

Units

MDL

INORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Sulfide, Reactive

mg/kg

10

440

86

ND

PACE Sample Number:
Date Collected:
Date Received:

97 0933590	97 0933603	97 0933611
12/11/90	12/11/90	12/11/90
12/11/90	12/11/90	12/11/90
SIA #44	SIA #44	SIA #64
0-1 ft.	1-2 ft.	0-1 ft.

Parameter

Units

MDL

INORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Sulfide, Reactive

mg/kg

10

46

11

810

PACE Sample Number:
Date Collected:
Date Received:

97 0933620
12/11/90
12/11/90
SIA #64
1-2 ft.

Parameter

Units

MDL

INORGANIC ANALYSIS

INDIVIDUAL PARAMETERS

Sulfide, Reactive

mg/kg

10

ND

Method Detection Limit
Not detected at or above the MDL.

REPORT OF LABORATORY ANALYSIS

Don Monnot
Page 3

January 08, 1991
PACE Project
Number: 101217509

0602.210

The data contained in this report were obtained using EPA or other approved methodologies. All analyses were performed by me or under supervision.

David Berger

David Berger
Manager, Inorganic Chemistry

Report To: Mr Don Monro

Pace Client No. 530628

Bill To:

Pace Project Manager D. Schoff

P.O. # / Billing Reference

Pace Project No. 10/21/512

Project Name / No. 101-22:218

Requested Due Date: 12-22-98

Sampled By (PRINT):

Sampled By (PRINT): JAMES J. KLINE

Sampler Signature	Date Sampled
-------------------	--------------

Station	Date Sampled
12/11/90	

06/11/21

ITEM NO	SAMPLE DESCRIPTION	TIME	MATRIX	PAGE NO
1	S1A #86 0-1 ft	1125	SOIL	93355
2	S1A #86 1-2 ft	1136	SOIL	93356
3	S1A #24 0-1 ft	1220	SOIL	93357
4	S1A #24 1-2 ft	1315	SOIL	93358
5	S1A #44 0-1 ft	1230	SOIL	93359
6	S1A #44 1-2 ft	1235	SOIL	93360
7	S1A #64 0-1 ft	1250	SOIL	93361
8	S1A #64 1-2 ft	1255	SOIL	93362

COOLER NOS	BAILERS	SHIPMENT METHOD	OUT DATE	RETURNED DATE

SHIPMENT METHOD	RETURNED DATE	
	OUT DATE	
1000		

BAILERS	SHIPMENT METHOD	OUT DATE	RETURNED DATE

NO. OF CONTAINERS

UNPRESERVED	H_2SO_4	HNO_3	VOA	
PRESERVATIVES				

ANALYSES
REQUEST

10

S/A	#86	0-1 ft	1125	501L	93355
S/A	#86	1-2 ft	1136	501L	93356
S/A	#24	0-1 ft	1320	501L	93357
S/A	#24	1-2 ft	1315	501L	93358
S/A	#44	0-1 ft	1230	501L	93359
S/A	#44	1-2 ft	1235	501L	93360
S/A	#64	0-1 ft	1250	501L	93361
S/A	#64	1-2 ft	1255	501L	93362

I hereby certify that the above is a true and correct copy of the original as the same appears in the records of the Department of the Interior.
 WASHINGTON, D. C., 1900.
 J. H. HARRIS, Secretary.

This image shows a blank, aged, cream-colored page, likely an endpaper or flyleaf of a book. The paper has a slightly textured appearance with some minor discoloration and dark smudges or stains along the left edge, possibly from the binding or handling. The right edge is slightly irregular. There is no text or other markings on the page.

COOLER NOS	BAILERS	OUT DATE	SHIPMENT METHOD	RETURNED DATE

Additional Comments

SHIPMENT METHOD	RETURNED DATE
OUT DATE	

[illegible]

Additional Comments

ORIGINAL.

SEE REVERSE SIDE FOR INSTRUCTIONS

CHAIN-OF-CUSTODY RECORD
Analytical Request

Report To: Don Morant
Pace Client No. 530628
Bill To: D & L Off
Pace Project Manager
P.O. # / Billing Reference
Pace Project No. 101211-309
Project Name / No. 100602.210
Requested Due Date: 12-27-90

Client SIA AMERICA INC
Address Po Box 22916
Alliance Ohio 44601
Phone _____

ITEM NO.	SAMPLE DESCRIPTION	TIME	MATRIX	PACE NO.	PRESERVATIVES				ANALYSES REQUEST	REMARKS	ACCEPTED BY	AFFILIATION	DATE	TIME
					UNPRESERVED	H ₂ SO ₄	HNO ₃	VOA						
1	SIA #70 0-1 ft	0840	SOIL	93347										
2	SIA #70 1-2 ft	0840	SOIL	93348										
3	SIA #48 0-1 ft		SOIL	93349										
4	SIA #48 1-2 ft		SOIL	93350										
5	SIA #8 0-1 ft		SOIL	93351										
6	SIA #8 1-2 ft		SOIL	93352										
7	SIA #103 0-1 ft		SOIL	93353										
8	SIA #103 1-2 ft		SOIL	93354										

COOLER NOS	BAILERS	SHIPMENT METHOD	OUT DATE	RETURNED DATE

RELINQUISHED BY	AFFILIATION	DATE	TIME
<u>Thomas J. Morant</u>	<u>Don Morant</u>	<u>12/11/90</u>	

Additional Comments

ATTACHMENT B

STATISTICAL ANALYSES

STATISTICAL CALCULATIONS

A. Calculation for Number of Samples Necessary.

Number of samples collected = 16

Mean \bar{x} = 182 mg/kg $t = 1.415$

Variance $s^2 = 121,130$

Std Deviation $s = 348$

$$\Delta = 500 - 182 = 318 \quad \begin{array}{l} \text{Rt} = \text{Regulatory Threshold} \\ = 500 \text{ mg/kg} \end{array}$$

Appropriateness of number of samples.

$$n = \frac{(1.415)^2 (121,130)}{318^2}$$

$$n = 2.40$$

Therefore only three samples needed

B. Calculation for Sample Reactive Sulfide Concentration at 90% Confidence Interval.

$$\bar{x} = 182$$

$$s = 348$$

$$\text{Std Error} = s_{\bar{x}} = \frac{348}{\sqrt{16}} = 87$$

Upper 90% CI = $182 + 87$ or 269 mg/kg
Therefore non-hazardous

Notes:

1. For the purpose of data analysis, it was assumed that all samples having sulfide content below analytical limits had a sulfide content at the detection limit (10mg/kg).
2. $t_{.10}$ is the student's "t" for a two tailed confidence interval and a probability of 0.20 and 7 degrees of freedom (eight random sampling locations). This is equal to a one tailed confidence interval and a probability of 0.1.
3. s^2 is much greater than x , implying several high values (ie. 1200 and 810) are abnormal and should be discarded. Exclusions of these probable outliers only serves to strengthen the non-hazardous status. Transformation of the data also produces a non-hazardous conclusion.

March 8, 1991

Mr. Donald F. Monnot
Plant Engineer
SIA America, Inc.
16123 Armour Street N.E.
Alliance, OH 44601

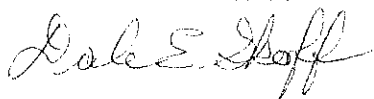
Dear Don:

Enclosed please find two (2) copies of the final lagoon sediment sampling and analysis report prepared by PACE Incorporated for SIA America's wastewater treatment lagoon site. Also enclosed are a copy of the submittal letter to Ohio EPA and a PACE performance evaluation questionnaire. Please complete and mail the questionnaire, which will be reviewed by our headquarters office in Minneapolis.

Per our conversation, I will call you on March 13 to discuss our follow-up contact to Ohio EPA on the report. Thank you for giving us the opportunity to provide our services.

Sincerely,

PACE INCORPORATED



Dale E. Skoff
Senior Environmental Specialist

DES045/jks

Enclosures

3/14/91
[Handwritten initials]



PROCESS LINES TO
LAGOON 1, CA/1805

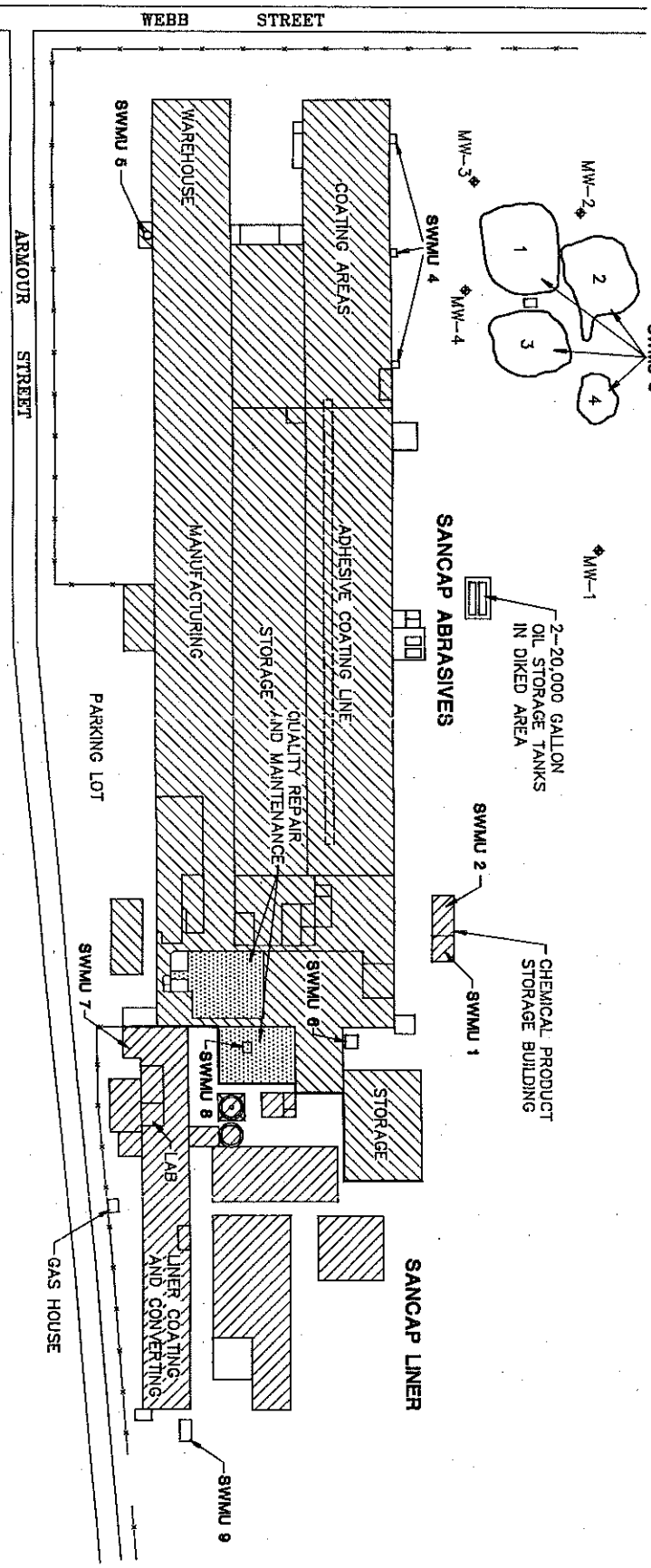
Secondary

C/A 1980



Primary

C/A 1980

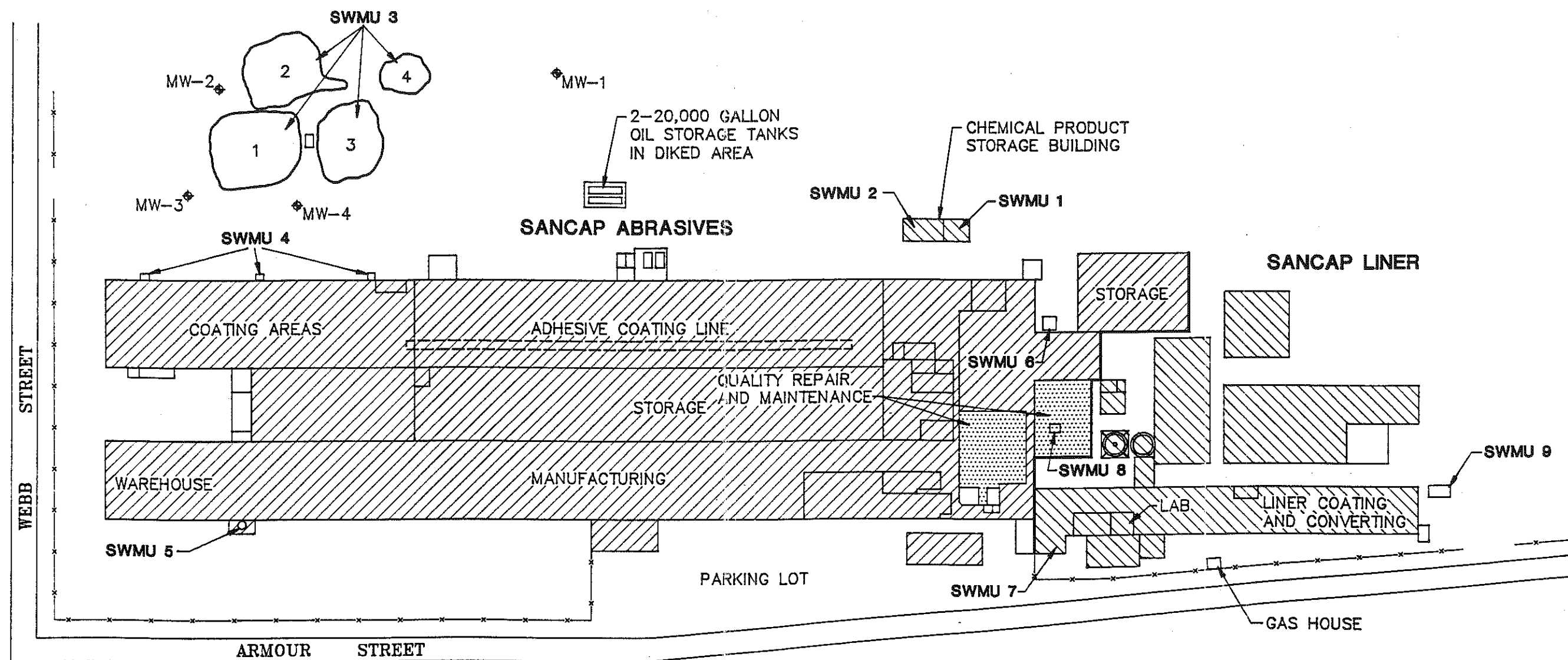


- SOLID WASTE MANAGEMENT UNITS**
- SWMU 1 - FORMER REGULATED HAZARDOUS WASTE STORAGE AREA
 - SWMU 2 - CURRENT HAZARDOUS WASTE ACCUMULATION AREA
 - SWMU 3 - SETTLING LAGOONS
 - SWMU 4 - WASTEWATER SUMPS
 - SWMU 5 - WASTEWATER PRETREATMENT UNIT
 - SWMU 6 - ABRASIVE ROLL-OFF BOX
 - SWMU 7 - STILL
 - SWMU 8 - USED OIL STORAGE DRUM
 - SWMU 9 - LINER ROLL-OFF BOX

- LEGEND**
- SANCAP ABRASIVES
 - SANCAP LINER
 - QUALITY REPAIR AND MAINTENANCE
 - MONITORING WELL

NOT TO SCALE

SANCAP ABRASIVES, INC. ALLIANCE, OHIO
FIGURE 2 FACILITY LAYOUT
PINC ENVIRONMENTAL MANAGEMENT, INC.



SOLID WASTE MANAGEMENT UNITS

- SWMU 1 - FORMER REGULATED HAZARDOUS WASTE STORAGE AREA
- SWMU 2 - CURRENT HAZARDOUS WASTE ACCUMULATION AREA
- SWMU 3 - SETTLING LAGOONS
- SWMU 4 - WASTEWATER SUMPS
- SWMU 5 - WASTEWATER PRETREATMENT UNIT
- SWMU 6 - ABRASIVE ROLL-OFF BOX
- SWMU 7 - STILL
- SWMU 8 - USED OIL STORAGE DRUM
- SWMU 9 - LINER ROLL-OFF BOX

LEGEND

- SANCAP ABRASIVES
- SANCAP LINER
- QUALITY REPAIR AND MAINTENANCE
- MONITORING WELL

SANCAP ABRASIVES, INC. ALLIANCE, OHIO
FIGURE 2 FACILITY LAYOUT
PRC ENVIRONMENTAL MANAGEMENT, INC.

NOT TO SCALE

SANCAP1.DWG - 12/05/92 - MJB 308-R060320H33

SOURCE: MODIFIED FROM SANCAP SKETCH RECEIVED BY PRC ON OCTOBER 27, 1992